United States Government Accountability Office
Washington, DC 20548

September 22, 2009

The Honorable Robert C. Scott
Chairman
Subcommittee on Crime, Terrorism,
   and Homeland Security
Committee on the Judiciary
House of Representatives

Subject: _Juvenile Justice: A Time Frame for Enhancing Grant Monitoring Documentation and Verification of Data Quality Would Help Improve Accountability and Resource Allocation Decisions_

Dear Mr. Chairman:

From fiscal years 2006 through 2008, the Office of Juvenile Justice and Delinquency Prevention (OJJDP) within the Department of Justice (DOJ) awarded $1.2 billion in funds through approximately 2,000 grants in support of its mission to help states and communities prevent and reduce juvenile delinquency and victimization and improve their juvenile justice systems.[1] OJJDP awards grants to states, territories, localities, and organizations to address a variety of issues, such as reducing juvenile substance abuse, combating Internet crimes against children, preventing youth gang involvement, and providing youth mentoring services. The scope and administration of OJJDP grants also vary, ranging from private organization recipients that implement programs directly in a single community to states that administer grants by awarding the funds they receive to subgrantees to implement programs locally and statewide.

Assessing the performance of these programs through grant monitoring is a key management tool to hold grantees accountable for implementing programs as agreed to in their awards, to verify they are making progress toward the objectives of their programs, and to ensure that grant funds are used in support of OJJDP's mission. DOJ's Office of Justice Programs (OJP) establishes grant monitoring policies for its components, including OJJDP.[2] In 2008, the DOJ Office of the Inspector General identified grant management, including maintaining proper oversight of grantees to

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[1] As of September 9, 2009, OJJDP was still in the process of announcing its grant awards for fiscal year 2009.

[2] OJP is comprised of OJJDP and four other components (i.e., bureaus, offices, and institutes). OJP's four other components include the Bureau of Justice Assistance, the Bureau of Justice Statistics, the National Institute of Justice, and the Office for Victims of Crime.

ensure grant funds are used as intended, as a critical issue and among the department's top management challenges. In the past, we have identified concerns specific to OJJDP's grant monitoring activities. In October 2001, we reported that OJJDP was not consistently documenting its grant monitoring activities, such as required phone contacts between grant managers and grantees, and as a result could not determine the level of monitoring being performed by grant managers.[3] We recommended that OJJDP take steps to determine why it was not consistently documenting its grant monitoring activities and develop and enforce clear expectations regarding monitoring requirements. Since that time, partially in response to our recommendation, OJJDP has taken steps to address this recommendation. For example, OJJDP conducted an assessment of additional policies and procedures that were needed for grant monitoring, and developed a manual that outlined steps for completing specific monitoring activities, such as review of grantee documentation.

To help Congress ensure effective use of funds for juvenile justice grant programs, you asked us to assess OJJDP's efforts to monitor the implementation of its grant programs. This report addresses the following questions:

- What processes does OJJDP have in place to monitor the performance of its juvenile justice grants, and to what extent does it record results of its monitoring efforts to ensure transparency and accountability?

- How, if at all, does OJJDP use performance measurement data to make programming and funding decisions, and to what extent does it verify the quality of these data?

To identify the processes OJJDP has in place to monitor the performance of its grants and assess the extent to which it records the results of its efforts, we analyzed relevant OJJDP documentation, including grant program monitoring policies, procedures, guidelines, and records, such as desk reviews and site visit reports, which grant managers are to complete to document monitoring results, including a grantee's level of accomplishment relative to stated goals. We interviewed cognizant OJJDP officials, including officials responsible for conducting grant monitoring activities from each of the three OJJDP divisions that manage its grant programs, as well as officials responsible for overseeing monitoring across the divisions. To identify federal criteria for grant monitoring processes and recording grant monitoring activities, we analyzed applicable laws, regulations, and *Standards for Internal Control in the Federal Government*, as well as policies and guidelines from OJP.[4] In addition, we interviewed OJP officials about its grant monitoring policies and procedures. We then compared OJJDP's processes for monitoring the performance of

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[3]GAO, *Juvenile Justice: Better Documentation of Discretionary Grant Monitoring Is Needed*, GAO-02-65 (Washington, D.C.: Oct. 10, 2001).
[4]GAO, *Standards for Internal Control in the Federal Government*, GAO/AIMD-00-21.3.1 (Washington, D.C.: November 1999).

its grants and recording monitoring activities with federal grant monitoring criteria to determine the extent to which OJJDP processes meet federal criteria.[5] We focused our analysis on OJJDP's processes for monitoring the performance of its discretionary, formula, and block grant programs.[6] We did not assess the extent to which grant managers complied with OJJDP processes and procedures because many of OJJDP's monitoring processes have only been established since August 2007 or are in the process of being implemented.

To determine how OJJDP uses performance measurement data to make programming and funding decisions and the extent to which it verifies these data to ensure their quality, we analyzed relevant documentation, including performance measurement policies, summary data reports generated by OJJDP, and records of grant manager observations. We then compared OJJDP's processes for using performance measurement data and for verifying these data with federal standards, as articulated in sources, including the Office of Management and Budget (OMB) guidelines on data verification,[7] our *Standards for Internal Control in the Federal Government*, standard practices for program management,[8] and OJP's Information Quality Guidelines,[9] to identify the extent to which OJJDP's processes meet these standards. We also interviewed the OJJDP official responsible for overseeing grant program performance measures as well as officials responsible for collecting data from grantees. Due to the volume of OJJDP performance measures—about 600 in total—we did not assess the quality of each individual metric.

We conducted this performance audit from March 2009 through September 2009 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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[5]In addition to *Standards for Internal Control in the Federal Government* and policy articulated by OJP, we also used in this analysis applicable laws, such as the Violence Against Women and Department of Justice Reauthorization Act of 2005, Pub. L. No. 109-162, 119 Stat. 2960, and guidance provided in OMB circulars A-102 and A-110.

[6]Discretionary grants provide funds to states, units of local government, and organizations to administer programs. OJJDP awards discretionary grants to recipients through an application process or based on congressional direction. In general, formula and block grant awards provide funds to states in accordance with statutory requirements. OJJDP allocates some formula and block grants to states on the basis of states' juvenile populations, while others may be awarded at a fixed level to all states. The term state means any state of the United States, the District of Columbia, the Commonwealth of Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands. 42 U.S.C. § 5603. OJJDP awards include grants for training, technical assistance, and research and evaluation efforts, which we did not include in our review.

[7]OMB Circular No. A-11, *Preparation, Submission, and Execution of the Budget.*

[8]Program management standards we reviewed are reflected in the Project Management Institute's *The Standard for Program Management* © (2006).

[9]Office of Justice Programs, *Information Quality Guidelines* (Washington, D.C.: December 2002), http://www.ojp.usdoj.gov/about/info_quality.htm (accessed Mar. 18, 2009).

Results in Brief

In accordance with OJP requirements, OJJDP has processes in place to monitor the performance of its juvenile justice grants including desk reviews, site visits, and postsite visit follow-up; however, the office does not have a process to record all follow-up steps taken to resolve grantee issues identified during site visits. Grant managers are to conduct grantee monitoring through three phases: (1) desk review, used to review grantee documentation to understand a grantee's level of accomplishment relative to its stated goals; (2) site visit, used to verify that grantees are implementing programs consistent with proposed plans; and (3) postsite visit, used to resolve issues identified during the visit. We found, during our review of OJJDP monitoring documentation, that desk review and site visit activities are to be recorded in OJP's automated repository, the Grant Management System, in accordance with OJP requirements. In addition, OJJDP officials said that OJJDP requires grant managers to record postsite visit actions taken through OJP's Correction Action Plan process, which OJJDP reserves for egregious circumstances, such as a failure to meet basic programming requirements.[10] However, OJJDP does not require that issues resolved informally, such as by e-mail, during the postsite visit phase be recorded in the system. Thus, OJJDP is not fully addressing OJP's requirement that all follow-up actions taken to resolve grantee issues identified during site visits be recorded in the Grant Management System. According to the OJJDP official who oversees monitoring, prior to OJP's May 2009 Grant Management System enhancements, it was cumbersome for grant managers to record resolution of grantee issues in the system. Therefore, although this official stated that OJJDP intends to fully implement OJP's requirement, the official said that the office does not have a time frame for implementing the requirement and anticipates grant managers will need time to adjust to the enhancements. Standard practices for program management state that the successful execution of any plan includes identifying in the planning process a timeline for delivering the plan. While we understand that it takes time to adjust to changes, establishing a time frame for implementing the requirement to record resolution of all grantee issues, including those resolved informally, will provide OJJDP with a concrete goal for fully implementing this requirement. Moreover, it will also help hold OJJDP accountable for developing processes, consistent with OJP requirements, to document all postsite visit actions taken—whether the issues identified are routine or egregious.

While OJJDP has developed performance measures for its grant programs and collects performance measurement data from its grantees, the office is making limited use of these data because it is not verifying these data to ensure their quality, which is inconsistent with leading management practices in performance measurement. As we have reported in the past, data verification—assessment of data completeness, accuracy, consistency, timeliness, and related quality control

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[10]OJP's Corrective Action Plan process includes requiring a grantee to develop a Corrective Action Plan that describes the issues in need of resolution and identifies tasks involved in resolving them, who will carry out the tasks, task deadlines, and how the problems will be corrected.

practices—helps to ensure that users can have confidence in the reported performance information.[11] According to OJJDP officials, they have not taken action to verify performance data because since 2002 they have focused on the collection of such data rather than on its utilization. Specifically, since 2002, OJJDP has developed performance measures for each of its grant programs and implemented requirements for all grantees to report on measures at least once a year. Although these officials said that OJJDP has processes in place to assess whether the data are appropriate for the performance measure, they stated that OJJDP does not have data verification processes in place and is dependent on grantees to report complete, accurate, consistent, and timely data. These officials also stated that because OJJDP does not know the quality of the data submitted, they do not use performance data to make resource allocation decisions. Due to the nature of OJJDP grant funding—of the $392 million it awarded in fiscal year 2008, OJJDP exercised its discretion to select recipients for 45 percent of these funds, and awarded the remaining 56 percent pursuant to a formula or fixed level, or based on direction from Congress—it is important that OJJDP officials and congressional decision makers have accurate performance information to be able to make funding decisions that are in line with performance results.[12] According to OJJDP officials, OJJDP is developing an approach to verify the performance measurement data collected from grantees; however, they could not provide documentation or a timetable for such an approach. According to standard practices for program management,[13] defining an approach, creating a plan for executing the approach, and developing timelines for the approach lay the groundwork for the successful execution of a program. Therefore, defining an approach to verify its performance measurement data and determining how it will execute the approach and the timelines for its implementation, would better position OJJDP to help ensure that it is providing quality information to the public, and to internal agency officials and congressional decision makers who play a role in determining where to allocate OJJDP funding resources. In addition, while OJJDP posts online performance reports that aggregate performance data for all grantees within a program as a mechanism to apprise the public of its programs' contributions to the juvenile justice field, it does not state in these reports that the data on which the reports are based have not been verified. OJJDP officials acknowledged that the reports do not state that the data have not been verified, but did not provide a reason for this omission. As we reported in March 2008 and according to OJP policy, it is important that the processes used to prepare communication products be transparent, clear, and understood.[14] Stating in each communication product containing performance measurement data that the limitations of the data are currently unknown as the data have not been verified would help OJJDP to ensure that the information it disseminates and specifically the limitations thereof are transparent, clear, and understood.

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[11]GAO, *Performance Plans: Selected Approaches for Verification and Validation of Agency Performance Information*, GAO/GGD-99-139 (Washington, D.C.: July 30, 1999).

[12]In general, requirements pertaining to how OJJDP allocates funding for its formula and block grant programs—i.e., based on a formula or fixed level—are derived from statutory requirements.

[13]The Project Management Institute, *The Standard for Program Management* © (2006).

[14]GAO, *Health and Safety Information: EPA and OSHA Could Improve Their Processes for Preparing Communications Products*, GAO-08-265 (Washington, D.C.: Mar. 31, 2008).

To help ensure the resolution of grantee issues, as well as ensure accountability for grantees fulfilling the conditions of their grants, we are recommending that the Administrator of OJJDP establish a time frame for implementing the requirement established by OJP for grant managers to record in the Grant Management System actions taken to resolve grantee issues consistent with OJP requirements. To help ensure the quality of performance measurement data submitted by grantees and improve these data to support agency and congressional decision making, we recommend that the Administrator of OJJDP finalize a data verification approach that includes how it will execute the approach to assess data completeness, accuracy, consistency, and timeliness, and time frames for implementing the approach consistent with standard practices for program management. Prior to verifying the data, to help ensure that the performance information in the communication products OJJDP disseminates is transparent, clear, and understood, we recommend that the Administrator of OJJDP note in each document containing performance measurement data that the limitations of the data are currently unknown as the data have not been verified. In commenting on a draft of this report, OJP agreed with our recommendations and described efforts it plans to take to address them. OJP comments are reprinted in enclosure IV.

Background

OJP is the main grant awarding office within DOJ and is comprised of OJJDP and four other components. In 2006, Congress passed the Violence Against Women and Department of Justice Reauthorization Act, which established the Office of Audit, Assessment and Management (OAAM) within OJP, among other things, to improve the monitoring of OJP grant programs and to undertake more timely action on grantees who do not comply with grant terms.[15] This act also requires that OJP monitor the performance of at least 10 percent of the grant funds it awards annually.[16] OAAM became operational in fiscal year 2007 and is charged with conducting assessments of grant programs within OJP components, ensuring grantee compliance with the financial terms of their grants, auditing OJP internal controls, and acting as a central source for OJP grant management policy. As such, OAAM sets OJP's guidelines and minimum standards for grant monitoring. While OAAM is charged in an oversight capacity with assessing grant programs, direct responsibility for monitoring grantees and supporting them in carrying out their programs rests with OJP components, including OJJDP. These components are required to adhere to OJP's minimum standards for grant monitoring and are responsible for ensuring the quality of the monitoring performed within the component. However, they may also elect to establish additional requirements for the monitoring performed within their respective components.

Within OJJDP, the Deputy Administrator for Programs oversees the office's three program divisions—Child Protection, State Relations and Assistance, and

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[15]Pub. L. No. 109-162, § 1158, 119 Stat. 2960, 3114-16.

[16]Many of OJP grant awards provide several years of funding. This requirement covers all open, active awards OJP provides to grantees at the beginning of the fiscal year, both through new grant awards, as well as those under way from previous years.

Demonstration Programs—which are responsible for administering OJJDP's grant programs and monitoring the individual grants within them.[17] OJJDP administers 26 grant programs, and makes individual grant awards—a total of approximately 2,000 from fiscal years 2006 through 2008—within each of them. Recipients of OJJDP awards include a variety of grantees ranging from private organizations that implement grant programs directly, such as a youth mentoring program, to states that administer grants by awarding the funds they receive to various state or local government subgrantees. Further, while some grantees operate programs in a single local community, others oversee statewide or even national programs, such as the Girl Scouts or the Boys and Girls Clubs of America. There are 33 grant managers across the three program divisions; within each of the divisions, grant managers are supervised by a first line supervisor and the head of the division. To hold grant managers accountable for the monitoring they are required to perform, OJJDP conducts annual performance reviews that assess managers on several dimensions. These dimensions include knowledge of the Grant Management System; use of the OJP tools to monitor grants; documentation of desk reviews, site visit reports, and other contact with grantees in the Grant Monitoring System; and completion of training to improve and maintain grant management skills. Figure 1 summarizes the components involved in OJJDP programmatic grant monitoring and their respective roles.

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[17]OJJDP's three program divisions administer grants to implement programs. OJJDP's Office of Policy Development, which assists the OJJDP Administrator in coordinating national policy on juvenile justice, also administers grants awarded for research and evaluation.

Figure 1: OJJDP Programmatic Grant Monitoring Organization
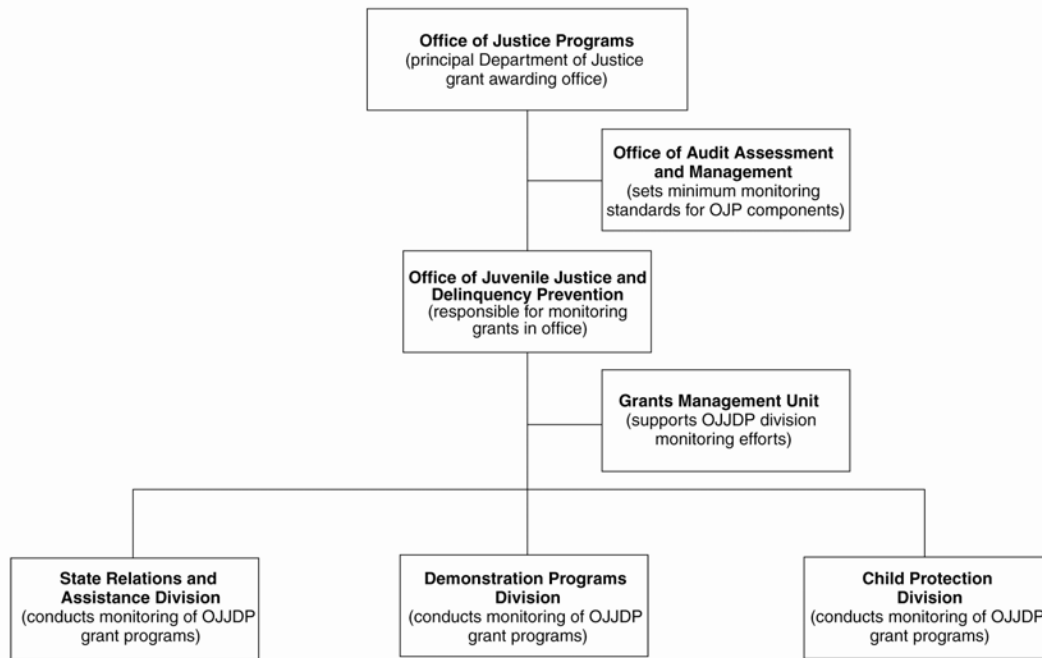
Source: GAO analysis of OJP data.

Note: OJJDP's organization includes a Grant Management Unit that is to support its program divisions by providing grant administration assistance and guidance. As of July 2009, the Grants Management Unit was not staffed. The director of the division was selected for another position in the agency and the three staff members in the unit were detailed to the three program divisions.

OJP directs that monitoring performed by its components include programmatic monitoring, through which grant managers assess the performance of grant programs by addressing the content and substance of a program.[18] During programmatic monitoring, grant managers review qualitative information (such as progress reports submitted by grantees and site visit reports documenting observations of grantee program implementation), and quantitative information (such as performance measurement data submitted by grantees), to determine grant performance, innovation, and contributions to the field. In grant applications, grantees are required to propose grant goals that support OJJDP's stated program purpose, the activities through which they aim to achieve those goals, and an implementation plan describing timelines and steps for the activities. For instance, the purpose of OJJDP's Tribal Youth Program is to support tribal efforts to prevent and control delinquency and improve tribal justice systems for American Indian/Alaska Native Youth. The proposed goals of one grantee that received funds under this program were to lower the number of delinquent activities and increase the decision-making abilities of youth within a tribal community, through activities including recruiting youth from the community and providing them with mentoring services. Through programmatic monitoring, grant managers determine whether grant activities are consistent with the grant goals and objectives. Among other things, the *OJP Grant Manager's*

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[18]OJP also requires its components to perform administrative and financial monitoring activities. Administrative monitoring addresses compliance with grant terms and grantee reporting and documentation requirements (e.g., inventory records for property used for the grant), and financial monitoring reviews expenditures compared to an approved budget.

Manual, which documents OJP grant monitoring policies and procedures, requires grant managers to review grantee documentation and converse with grantees to assess the extent to which implementation of a grant program is consistent with the grantee's planned timelines and proposed activities and goals.

During programmatic monitoring, grant managers help ensure that grantees comply with relevant statutory and regulatory requirements. For example, the Juvenile Justice and Delinquency Prevention Act requires states receiving formula grant funding to submit a state plan annually that, among other things, provides for an advisory group. The members of this group must include, among others, at least one locally elected official, and representatives of law enforcement and juvenile justice agencies.[19] Grant managers ensure that the state advisory groups meet these membership requirements and provide them with training as needed to support them in performing their required functions. Further, grant managers are to assess grantee performance in meeting the objectives of their grants, such as providing services to a specific number of program participants, and if they are not doing so, grant managers are to collaborate with the grantee to resolve the issue. Grant managers may also provide or recommend technical assistance to help grantees implement their programs consistent with their grant awards and help grantees address any challenges they may encounter in doing so.[20] For instance, if a grantee confronts program implementation challenges, such as underenrollment of youth in their program or if they need assistance to design a necessary survey, grant managers may work with the grantee to identify solutions and ensure relevant training opportunities are available to the grantee.

OJP's minimum standards for grant monitoring require that grant managers conduct programmatic monitoring activities defined by its three phases for conducting and following up on monitoring: (1) desk review, (2) site visit, and 3) postsite visit.[21]

- During the desk review phase, grant managers review grant documentation to obtain an understanding of a grantee's level of accomplishment relative to stated goals and prepare for the site visit phase. Among other things, grant managers are required to review progress reports submitted by grantees to determine if the reports contain information, such as performance

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[19]42 U.S.C. § 5633(a)(1).

[20]OJJDP maintains a network of technical assistance providers who are available to offer a range of services and training on a variety of issues.

[21]These standards are articulated in the *OJP Grant Manager's Manual*, which documents grant monitoring policies and procedures for OJP bureaus. This manual also identifies two phases that precede the three phases described above. For the purposes of this review and examining what processes OJJDP has in place to monitor the performance of its grants and record the results of its monitoring efforts, we did not focus on these first two phases in which grant managers plan and prepare for monitoring activities such as reviewing background material—e.g., the grantee's organizational charts or lists of key personnel—and making appointments for site visits. Instead, we focused on the two phases that address the specific monitoring activities laid out by the *OJP Grant Manager's Manual*—i.e., desk reviews and site visits—and the final phase that provides postsite visit policies and procedures as a result of the monitoring efforts. For more information about the first two phases, see enclosure I. According to OJP officials, as of June 2009, OJP was in the process of revising the current version of this manual, which it expects to complete by the end of fiscal year 2009.

measurement data, related to the grantee's performance in implementing the grant program.[22]

- During the site visit phase, grant managers meet with the grantee, review documents, such as the grantee's planned implementation timeline, and observe program activity to assess how grant program objectives are being implemented and to compare planned versus actual progress. Grant managers use OJP's site visit checklist to guide their assessments. Among other things, this checklist instructs grant managers to identify any implementation challenges the grantee is experiencing and any technical assistance the grantee requires.
- During the postsite visit phase, grant managers report their findings to the component and to the grantee being monitored, including any grantee issues they identify in need of resolution (e.g., program services that are untimely or of poor quality). When a grant manager identifies issues in need of resolution as part of a site visit, the grant manager is responsible for following up with the grantee to make sure that issues or questions are resolved.

In addition to performing activities included in these three phases, OJP also requires that grant managers perform ongoing monitoring throughout the course of their monitoring efforts. Ongoing monitoring entails frequent communication between grant managers and grantees via telephone and e-mail, during which grant managers may identify problems a grantee is experiencing, provide programmatic advice, or assist in resolution of any problems impeding program implementation. For example, in the course of ongoing monitoring, a grant manager may advise a grantee about how to design a survey or discuss strategies for enrolling youth in grantee programs.

Since 2007, OJP has taken steps to revise its grant monitoring policies and procedures and to develop more automated and standard monitoring tools. For example, in August 2007 it released a revised and expanded *OJP Grant Manager's Manual*, which documents OJP grant monitoring policies and procedures. OJP has also expanded the capabilities of its automated Grant Management System. Among other features, the Grant Management System now enables grant managers to collect monitoring information in a uniform fashion and provides checklists for grant managers to use during monitoring activities.[23] Additionally, OJP has developed an assessment tool intended to provide a common approach for grant managers to assess risk associated with grantees and prioritize their monitoring activities based on their assessments. Using this tool, grant managers apply standard criteria, such as the grantee's performance and the complexity of the award, to assess the risk associated with the grant, which they then use to assign the grant a monitoring priority ranging from low to high.[24]

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[22]All grantees are required to submit progress reports to OJJDP at least annually. While discretionary grantees and select formula and block grantees are required to submit reports semiannually, other formula and block grantees are required to submit reports annually.

[23]OJP initially provided these features to grant managers through its Grant Monitoring Tool. After recording monitoring activities within this tool, grant managers were to upload the tool to the Grant Management System. In May 2009, OJP embedded this tool within the Grant Management System.

[24]Grant managers are to consider grantee performance to be of high risk if there are concerns related to the implementation of the program and ability to meet program objectives, such as if a grantee repeatedly requests scope changes, key personnel changes, or project budget modifications. Grant

Internal controls for ensuring the effectiveness of agency operations require timely and accessible documentation of information in order for management to carry out its operational responsibilities, such as determining whether the agency is meeting its goals. Accordingly, it is important that grant managers consistently record their monitoring efforts to assess the performance of grant programs.[25] OJP policy directs managers to record the range of their programmatic monitoring activities in the Grant Management System, including desk reviews, site visits, and site visit follow-up. Enclosure I provides more detailed information about OJP's minimum standards for performing and recording programmatic monitoring.

According to leading practices in performance measurement, performance measures should be linked directly to the offices that have responsibility for making programs work to reinforce accountability and ensure that day-to-day activities contribute to the results the organization is trying to achieve.[26] As we have previously reported, verification and validation—assessing whether data are appropriate for the performance measure—are fundamental to agency management. Specifically, verification and validation help to ensure that data are of sufficient quality and will be available when needed to document performance and support decision making.[27] Additionally, according to OMB, an agency can increase the level of confidence Congress and the public have in its performance information by applying verification and validation criteria to the performance measurement data, such as providing information on data quality by defining and documenting data limitations.[28]

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managers are to consider awards of high complexity as higher risk compared to other programs if they require additional oversight (e.g., awards with several distinct purpose areas).

[25]According to our *Standards for Internal Control in the Federal Government*, internal control is an integral component of an organization's management that provides reasonable assurance that the following objectives are being achieved: reliability of financial reporting; compliance with applicable laws and regulations; and effectiveness and efficiency of operations, including the use of the entity's resources. (GAO/AIMD-00-21.3.1.)

[26]These practices are based on the 1993 Government Performance and Results Act of 1993 (GPRA), which requires cabinet-level agencies to identify performance measures to measure the results of program activities, in order to, among other things, promote public confidence in the federal government by systematically holding agencies accountable for achieving program results; improve program effectiveness by focusing on results, service quality, and customer satisfaction; and improve congressional decision making. Pub. L. No. 103-62, 107 Stat. 285 (codified as amended in scattered sections of 5 U.S.C., 31 U.S.C., and 39 U.S.C.).

[27]In 1999, we reported that the approaches agencies use to verify and validate performance measurement data should address key dimensions of data quality, which include but are not limited to: completeness—the extent to which enough of the required data elements are collected from a sufficient portion of the target population or sample; accuracy—the extent to which the data are free from significant error; consistency—the extent to which data are collected using the same procedures and definitions across collectors and times; timeliness—whether data about recent performance are available when needed to improve program management and report to Congress; and ease of use—how readily intended users can access data, aided by clear data definitions, user-friendly software, and easily used access procedures. GAO, *Performance Plans: Selected Approaches for Verification and Validation of Agency Performance Information*, GAO/GGD-99-139 (Washington, D.C.: July 30, 1999).

[28]OMB, Circular No. A-11, *Preparation, Submission, and Execution of the Budget.*

OJJDP Has Processes in Place to Monitor the Performance of Its Grants, but Could Better Ensure Accountability by Establishing a Time Frame for Implementing OJP's Requirement to Record Resolution of Grantee Issues

OJJDP has processes in place to monitor the performance of its juvenile justice grants and to record the results of activities performed during two of its three phases for conducting and following up on monitoring in the Grant Management System. According to OJJDP officials, the agency intends to fully implement OJP's requirement that grant managers record steps taken to resolve all issues identified during site visits, but as of August 4, 2009, it had not yet established a time frame for doing so. By establishing a time frame, OJJDP will have a concrete goal for fully implementing OJP's requirement. Furthermore, such a goal will help hold OJJDP accountable for developing processes to ensure that grant managers are resolving issues they identify during site visits and holding grantees accountable for achieving program goals as management intended.

<u>OJJDP Has Processes in Place to Monitor the Performance of Its Grants and to Record the Results of Two of Its Three Monitoring Phases in the Grant Management System</u>

OJJDP has processes in place in accordance with OJP requirements to perform activities included in OJP's three phases for conducting and following up on monitoring—desk review, site visit, and postsite visit. The official responsible for overseeing grant monitoring across OJJDP divisions stated that the processes used by OJJDP grant managers to complete monitoring activities are guided by the policy and instructions provided in the *OJP Grant Manager's Manual*. Accordingly, at the beginning of each year, OJJDP grant managers use OJP's risk assessment tool in conjunction with their own discretion to assign grants a monitoring priority level and to select grants for which they plan to conduct monitoring site visits. If a site visit is planned for a grant, an OJJDP grant manager completes a desk review for the grant using an OJP desk review checklist in preparation for the visit.[29] For all grants for which OJJDP has not planned a site visit, a grant manager completes a desk review at some time during the year. During site visits, grant managers are to follow the guidance provided in the OJP site visit checklist to guide their activities. This checklist includes eight standard programmatic review categories on which grant managers are to assess grantees, such as if the grantee is implementing grant activities and providing grant services as proposed in the grant application, if the grantee is experiencing any challenges in implementing its program, and if the grantee requests technical assistance. Grant managers determine their responses for each of these categories based on discussion with the grantee, documentation review,

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[29]The OJP desk review checklist instructs grant managers to, among other things, review the original grant application and official correspondence with the grantee to ensure a complete understanding of the project's objectives and status, review progress reports submitted by the grantee within the last year to ensure they are complete (e.g., that they describe the grantee's progress in achieving each task in relation to project milestones), and create a list of questions for the grantee based on the review. According to OJJDP officials, consistent with OJP policy, grant managers may elect to use an assessment completed using OJP's risk assessment tool in lieu of the OJP desk review checklist to complete a desk review. According to OJP, risk assessments require grant managers to respond to the same questions as the OJP desk review checklist.

and observation of grantee activities. According to OJJDP records, in fiscal year 2008 the office completed 316 site visits of programs that had a collective value of 28 percent of the total dollar amount of OJJDP's open grant awards.

Following site visits, grant managers are to write a site visit report summarizing their findings, including any grantee issues in need of resolution. For example, grant managers may find that a grantee has not enrolled as many youth from its target population as it had planned or that the grantee is not complying with special conditions of the grant, such as that at least 20 percent of its advisory board members are under the age of 24 at the time of their appointment. Grant managers are to work with grantees following site visits to resolve any issues they identify. If a grant manager is concerned about an issue, the manager may require the grantee to undergo the Corrective Action Plan process, which involves developing a plan that describes the issues in need of resolution and identifies tasks involved in resolving them, who will carry out the tasks, task deadlines, and how the problems will be corrected. However, according to OJJDP officials, grant managers reserve this course of action for egregious circumstances that rarely occur.[30] Officials said that the majority of the time, grant managers elect to work with the grantee to resolve issues they identify during site visits less formally, through means such as troubleshooting via telephone or e-mail. According to OJJDP officials, findings for which a grant manager would not require a Corrective Action Plan could include circumstances such as if a grantee stated it would enroll 100 children in its service program in its application and has only enrolled 10 children. To resolve this issue, a grant manager may discuss strategies with a grantee for enrolling youth from its target population by telephone or e-mail, or if the grant manager deems appropriate, assist the grantee to revise the target population stated in the grant award.

OJJDP also has processes in place for recording the results of two of these monitoring phases—desk review and site visit—in the Grant Management System in accordance with OJP documentation requirements. Specifically, after completing desk reviews, grant managers are to upload a copy of the completed checklist used to conduct the review to the Grant Management System. Similarly, after completing site visits, grant managers are to record the results from the visit by generating a site visit report using the template provided in the Grant Management System and saving the report in the system. According to OJP officials, OJP counts monitoring performed by its components toward the requirement that it monitor at least 10 percent of the total value of its open grant awards annually if the monitoring is documented by a site visit report and site visit checklist in the Grant Management System. According to these officials, in 2008 OJJDP grant managers documented site visit reports for more than 10 percent of the total value of OJJDP's open awards in the Grant Management System. Specifically, according to OJJDP data, grant managers recorded site visit reports for 28 percent of the value of the office's $1.1 billion in open awards.

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[30]According to OJJDP, an example of an egregious circumstance in fiscal year 2007 was when a grant manager required a grantee to develop a Corrective Action Plan following a visit in which the grant manager observed that the grantee was failing to meet several basic programmatic requirements, including hiring a coordinator for the program and implementing the project design.

According to the senior OJJDP official who oversees monitoring efforts, it is important for grant managers to record monitoring activities in the Grant Management System in order to assess the performance of grant managers and to ensure the completion and quality of monitoring activities. The Grant Management System is OJJDP's sole system that provides management with ready access to grant monitoring records for all of its grants. OJJDP also uses documentation in the system to keep track of the tasks grant managers have performed and those outstanding, to track the amount of time it takes grant managers to accomplish monitoring activities, and to assess the quality of the monitoring performed by grant managers.

<u>Establishing a Time Frame to Fully Implement OJP's Requirement for Managers to Record All Actions Taken to Resolve Grantee Issues Identified during Site Visits Would Improve Accountability</u>

Since the beginning of fiscal year 2008, the *OJP Grant Manager's Manual* has required that grant managers record all of their actions to resolve grantee issues identified during site visits—whether they are addressed through the Corrective Action Plan process or less formally—in the Grant Management System. OJP officials identify documentation in the Grant Management System as important in order to ensure that monitoring occurs and that grant funds are used as intended. Further, OJP officials stated that, beyond providing general accountability by offering a means to illustrate that monitoring has occurred, documentation in the Grant Management System also provides information about the performance of grantees that can be used to both determine if grantees are using funds to implement grant programs in accordance with the objectives of their awards and to inform future funding decisions. According to OJP officials, prior to fiscal year 2008, OJP required grant managers to document these activities, but they were permitted to do so outside of the Grant Management System. OJP officials identify recording efforts to resolve grantee issues identified during site visits as important in order to provide assurance that grant managers are fulfilling their responsibility to resolve the grantee issues they identify. In addition, federal internal control standards identify the importance of, and require timely and accessible documentation of, such information.[31]

OJJDP has not fully implemented the requirement for grant managers to record resolution of grantee issues identified during site visits in the Grant Management System. Although OJJDP requires grant managers to record resolution of issues addressed through Corrective Action Plans in the system, it does not require them to record actions they take to informally resolve issues for which a Corrective Action Plan has not been required, even though according to OJJDP officials this is the means by which they resolve these issues the vast majority of the time. According to OJP officials, OJJDP grant managers rarely, if ever, record these less formal efforts in the Grant Management System. As a result, officials have limited assurance that resolution of these issues occurs.

According to the senior OJJDP official responsible for overseeing monitoring, OJJDP intends to implement OJP's requirement to record resolution of all issues identified during site visits in the Grant Management System, including those resolved

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[31]GAO/AIMD-00-21.3.1.

informally. However, the official stated that OJJDP has not yet done so because grant managers are adjusting to this requirement, and prior to May 2009, the Grant Management System did not provide grant managers with a user-friendly means to record these efforts. The OJJDP official stated that, as of July 2009, OJJDP encouraged, but did not require, grant managers to record informal actions they took to resolve grantee issues and that OJJDP identified recording efforts to resolve issues, including through these informal methods, as important because recording these efforts allowed the office to ensure that resolution was achieved. The official explained that experienced grant managers pride themselves on their monitoring techniques and ability to provide assistance to grantees, and that some view recording their actions in the Grant Management System as burdensome. The official stated that the most recent version of the Grant Management System, which OJP deployed in May 2009, provides enhanced capabilities for tracking resolution of grantee issues that will enable grant managers to more easily record in the system their less formal efforts to resolve grantee issues. While OJP officials acknowledged that the most recent version of the Grant Management System provides a more user-friendly means for grant managers to record resolution of issues, they emphasized that the previous system provided a means to record these efforts, and that OJP policy required them to be recorded prior to the deployment of the new system as well. Although OJP has begun to provide training to OJJDP grant managers in using the new system, the senior official responsible for overseeing monitoring believes it will take time to get these grant managers to record their site visit follow-up work in the Grant Management System.

However, OJJDP has not established specific time frames, in accordance with standard practices for program management, for fully implementing OJP's requirement. Standard practices for program management state that the successful execution of any plan includes identifying in the planning process the schedule that establishes the timeline for delivering the plan. The senior OJJDP official responsible for overseeing monitoring stated that currently documentation of issue resolution may be captured in e-mail correspondence between grant managers and grantees. While this may be the case, e-mail correspondence is not necessarily captured in the Grant Management System and, therefore, is not readily accessible to OJJDP management to facilitate its oversight of grant managers. In addition, we understand that OJP has been introducing new grant monitoring tools, such as checklists for grant managers to use during monitoring activities and Grant Management System modules that enable grant managers to collect monitoring information in a uniform fashion, and that it takes time to adjust to these changes. However, according to OJP officials, prior to establishing the requirement at the beginning of fiscal year 2008 for grant managers to document resolution of issues identified during site visits in the Grant Management System, OJP required that grant managers maintain documentation of these efforts outside of this system. According to OJJDP officials, OJJDP does not currently have a requirement in place to record informal actions taken to resolve issues within the Grant Management System or outside this system, nor does it have a time frame for implementing such a process as required by standard practices for program management. Furthermore, documentation of grant

monitoring is not a new issue for OJJDP, as we reported in 2001 that the agency was not consistently documenting its grant monitoring activities.[32]

Because OJJDP has not fully implemented the requirement for grant managers to record in the Grant Management System all of their efforts to resolve grantee issues, OJJDP does not have reasonable assurance that grantee issues identified during site visits are resolved, or have a means by which they can hold grant managers or grantees accountable for resolving such issues. Although OJJDP has processes in place to record desk review checklists in the Grant Management System, these checklists do not include information about less formal actions taken following site visits to resolve grantee issues. Also, while site visit reports recorded in the Grant Management System may include information about the status of issues identified during previous visits, OJJDP may only perform site visits for a grantee once every several years. Therefore, these processes do not provide a means to ensure issues are resolved in accordance with OJJDP's directives.

Without OJJDP ensuring documentation of resolution of all issues identified during site visits, OJJDP lacks reasonable assurance that grant managers are fulfilling their responsibility to resolve issues identified during site visits for which a Corrective Action Plan is not required. Establishing a timeline for implementing this requirement consistent with standard practices for program management would provide OJJDP with a concrete goal for developing processes consistent with OJP requirements, to record all postsite visit actions taken and thereby better position OJJDP to help ensure that grant programs are being implemented in a manner that supports program objectives.

OJJDP Has Taken Action to Collect Performance Measurement Data from Grantees, but Ensuring and Reporting on Performance Measurement Data Quality Would Help Inform and Improve Resource Allocation Decisions

As part of its programmatic monitoring efforts, OJJDP has developed performance measures for its grant programs and processes for collecting performance measurement data from its grantees. According to the senior OJJDP official who oversees monitoring efforts, OJJDP initiated efforts in 2002 to develop performance measures to collect and report data that measure the results of funded activities consistent with the Government Performance and Results Act of 1993 (GPRA) requirements.[33] Since this time, OJJDP has developed output and outcome performance measures for each of its grant programs and implemented requirements for all grantees to submit specific performance measurement data on at least an

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[32]GAO, *Juvenile Justice: Better Documentation of Discretionary Grant Monitoring Is Needed*, GAO-02-65 (Washington, D.C.: Oct. 10, 2001).

[33]GPRA requires DOJ to collect and report performance measurement data as part of its annual budget process. 31 U.S.C. §§1115-16. Although GPRA only requires collecting and reporting of performance data at the executive agency level, according to OJJDP, as a component of DOJ it assumes responsibility for collecting and reporting on performance data to meet DOJ GPRA requirements.

annual basis that measure the results of their work.[34] Specific performance measures vary by the type of grant program, but examples of performance measurement data that grantees are required to report include the percentage of youth who reoffend, the percentage of youth who exhibit a positive change in behavior, and the extent to which the grantee is using an evidence-based program—that is, a program model that research has demonstrated to be effective. For more detailed information on OJJDP performance measures, see enclosure II.[35]

OJJDP has also developed an online system called the Data Collection and Technical Assistance Tool (the Data Tool) to collect performance measurement data from grantees. Grantees submit performance measurement data through this Data Tool, which centralizes the data and enables OJJDP to aggregate performance measurement data across grantees.[36] According to OJJDP officials, 2006 was the first year that all grantees submitted performance measurement data through this tool. These officials stated that prior to the development of the Data Tool, some grantees reported performance measurement data in the narratives of their progress reports; however, it was difficult for OJJDP to use these data because the data could not be easily aggregated. The Data Tool has some edit checks built into the system that require grantees to submit answers within the range of response possibility (e.g., the Tool generates an error message if a grantee attempts to enter 30 when the appropriate response range is 1 through 6).

In addition to these checks in the Data Tool, grant managers are also to review performance measurement data to corroborate performance data reported in the narrative of grantee progress reports, and examine data over time to ensure data patterns are reasonable.[37] In addition, according to OJJDP officials, as performance measures are being developed and during annual reviews, OJJDP validates performance measurement data to assess whether the data are appropriate for the performance measure. Lastly, OJJDP reported that it initiated several technical assistance efforts to help prepare grantees to collect and report data. These include conducting teleconference training calls, making presentations at grantee meetings, and developing a Web page that features performance measure training resources and guidelines.

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[34]According to OJJDP, output measures, or indicators, measure the products of a program's implementation or activities. These are generally measured in terms of the volume of work accomplished, such as amount of service delivered; staff hired; systems developed; sessions conducted; materials developed; and policies, procedures, or legislation created. Outcome measures, or indicators, measure the benefits or changes for individuals, the juvenile justice system, or the community as a result of the program. Outcomes may be related to behavior, attitudes, skills, knowledge, values, conditions, or other attributes.

[35]While we assessed how OJJDP uses performance measurement data to make programming and funding decisions and the extent to which OJJDP verifies these data, due to the volume of OJJDP performance measures—approximately 600 in total—we did not assess the quality of each of these individual metrics.

[36]OJP officials stated that OJP is looking to integrate the Data Tool into the Grant Management System to make it an OJP-wide performance measurement data collection system.

[37]According to the OJJDP official who oversees the office's performance measures, grant managers would benefit from more training and guidance on how to review performance measurement data. This official stated that with their current level of training, it is difficult for grant managers to determine if data patterns are reasonable.

According to the OJJDP official who oversees the office's performance measures, OJJDP intends to implement a more systematic approach for verifying its performance measurement data so as to ensure its quality and use the data to make resource allocation decisions. However, according to OJJDP officials, their use of performance measurement data is limited as they do not have a documented, systematic approach for verifying the data to ensure its quality. As we have previously reported, verifying data should address key dimensions of data quality, such as: data completeness—the extent to which enough of the required data elements are collected from a sufficient portion of the target population or sample; data accuracy—the extent to which the data are free from significant error; data consistency—the extent to which data are collected using the same procedures and definitions across collectors and times; and data timeliness—whether data about recent performance are available when needed to improve program management and report to Congress.[38]

Data verification helps to ensure that data are of sufficient quality and will be available when needed to document performance and support decision making. That is, data are to be credible or seen by potential users to be of sufficient quality to be trustworthy. As we previously reported[39] congressional leadership has stated that performance plans based on incomplete or inaccurate data would be of little use to Congress.[40] We have also reported that agencies that understand the linkage between expended resources and performance results are better able to allocate and manage their funding resources effectively because agency officials and congressional decision makers are in a better position to make informed funding decisions that target resources to improve overall results.[41] In addition, according to leading management practices in performance measurement, primary responsibility for the quality of a program's data rests with the manager of that program. As such, consistent with these practices, OJJDP has a responsibility to ensure the quality of the data it collects from grantees.[42]

OJJDP officials stated they have not yet performed verification efforts to ensure the quality of their data because they have focused on the collection of performance measurement data rather than on utilization. As a result, these officials stated that OJJDP is currently dependent on grantees to report complete, accurate, consistent, and timely data. This is an issue, according to OJJDP officials, because they do not know the quality of the data submitted by grantees and, therefore, do not use these data to make resource allocation decisions. According to OJP and OJJDP officials, if grantees are reporting that they are adhering to the requirements articulated for their

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[38]GAO/GGD-99-139, 13.

[39]GAO/GGD-99-139, 1.

[40]GPRA requires each agency to submit a performance plan with its annual budget submission. Each agency's plan should: establish performance goals to define the level of performance to be achieved by a program activity, express such goals in a measurable form, establish performance indicators to be used in measuring the goals, provide a basis for comparing actual results with goals, and describe a means to verify and validate measured values. 31 U.S.C. § 1115.

[41]GAO, *Executive Guide: Effectively Implementing the Government Performance and Results Act*, GAO-GGD-96-118 (Washington, D.C.: June 1996).

[42]GAO/GGD-99-139, 25.

awards and acting on their proposed activities and timelines, OJJDP is likely to continue funding the grant regardless of the program's performance data or performance results. The OJJDP official responsible for overseeing performance measurement data collection acknowledged a need to verify OJJDP's performance measurement data and has drafted an approach for program managers to verify the data they collect. However, the approach has not been internally vetted, and OJJDP officials hope to further develop this approach in the fall of 2009 in conjunction with the Office of Audit Assessment and Management (OAAM). Among other things, OJJDP officials anticipate developing specific processes for grant managers to verify data during site visits and developing activities for grantees to verify data submitted to them by subgrantees to include in this approach. Over the course of our audit work, OJJDP could not provide evidence of the approach because it is in draft and is subject to change. While OJJDP officials agree with the importance of an approach to verify performance measurement data and hope to further develop and implement an approach in the future, they stated that OJJDP has not established timelines or a schedule for its completion. Standard practices for program management state that the successful execution of any plan includes identifying in the planning process the schedule that establishes the timeline for delivering the plan, in this case an approach for verifying performance data.[43]

Having quality performance measurement data could help both Congress and OJJDP officials determine how to allocate and distribute OJJDP funding resources. This is especially important because of the $392 million it awarded in fiscal year 2008, OJJDP exercised its discretion to select recipients for 45 percent of these funds, and awarded the remaining 56 percent pursuant to a formula or fixed level or based on direction from Congress.[44] However, because OJJDP has not yet verified these data, it cannot be assured of the quality of the results it is reporting. For example, OJJDP generates summary performance reports through its Data Tool that aggregate performance data for all grantees within a program. OJJDP uses these reports, which it posts on-line, as a mechanism to apprise the public of its programs' contributions to the juvenile justice field. However, according to officials, because OJJDP does not verify the data on which these reports are based, it cannot know whether the information contained within them is complete, accurate, consistent, and timely.

In addition, OJJDP does not state in the performance reports that the data on which the reports are based have not been verified. As we have previously reported, it is important that the processes that agencies use to prepare communication products be documented, transparent, and understood.[45] Further, in order to ensure transparency, OJP Information Quality Guidelines require OJJDP to disseminate information that is accurate, clear, and complete, in part, by reporting the limitations of the information it disseminates. Because OJJDP does not acknowledge in the performance reports generated through its Data Tool that the source data for the reports have not been verified, it cannot provide reasonable assurance to the public, whom they are intended to inform, that the information they contain is transparent, clear, and understandable. OJJDP officials acknowledged that the reports do not

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[43]The Project Management Institute, *The Standard for Program Management* © (2006).
[44]See enclosure III for a detailed description of OJJDP grant funding.
[45]GAO-08-265, 43.

state that the data have not been verified, but did not provide a reason for this omission. Additionally, according to OJJDP officials, the office provides information to OMB in intermittent updates on its performance. In the past, it has also provided information to OMB for the Program Assessment Rating Tool (PART) review process.[46] In fiscal year 2006, OJJDP underwent a PART review and received an overall rating of "adequate." One of the three follow-up action items recommended included performance information in budget submissions to better link resources requested to program performance goals.[47] OJP's fiscal year 2009 budget includes annual and long-term performance measures and data, but verifying these data would better instill confidence in its quality.

According to the OJJDP official in charge of OJJDP's performance measurement data, OJJDP's long-term goal is to be able to use performance measurement data to guide its program planning and grant award decisions so OJJDP can allocate its resources in accordance with performance results—i.e., toward the better performing programs. However, OJJDP has not finalized its approach, or established timelines for its completion. As articulated in *The Standard for Program Management*, the successful execution of any plan includes defining an approach for the plan and establishing timelines for its completion. Following these steps will assist OJJDP in the successful execution of its long-term performance measurement goal of verifying grantee data and better position it for allocating resources in accordance with program results.

Conclusions

As the federal office charged with supporting states and communities in their efforts to prevent and reduce juvenile crime and victimization, OJJDP provides funding through numerous grants to support a variety of programs. Monitoring the performance of these grants and maintaining timely and accessible records of these monitoring efforts is critical to determine whether OJJDP, and those programs to which it provides funding, are meeting their goals and objectives. Although OJJDP has processes in place to monitor the performance of its grants and to record the results of two of its three monitoring phases, establishing a time frame for implementing OJP's requirement that the results from OJJDP's third follow-up phase—resolving grantee issues identified during site visits—are fully documented will provide OJJDP with a concrete goal for implementing this requirement. Furthermore, it will also help hold OJJDP accountable for developing processes, consistent with OJP requirements, to record all postsite visit actions taken. As a result, OJJDP will be better positioned to help ensure that its grant managers are conducting activities in accordance with its directives to hold grantees accountable for achieving program goals.

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[46]PART assessments are aimed to assess and improve program performance so that the federal government can achieve better results.

[47]The other two action items were (1) make juvenile justice programs' performance results available to the public through program publications and the Internet, and (2) develop a comprehensive evaluation plan for the juvenile justice programs to obtain better information on the programs' effects.

With respect to performance measures, while OJJDP has developed measures and established processes to collect performance data from grantees, finalizing its approach to verify the completeness, accuracy, consistency, and timeliness of these data and determining the approach's timelines for implementation would provide OJJDP with additional assurance regarding the data's quality in order for agency officials and Congress to use these data to measure the performance of its grants and make funding decisions that are in line with results. In addition, discussing limitations of unverified performance measurement data included in its communication products as required by OJP standards would help OJJDP to ensure that the information it disseminates, and particularly the limitations thereof, are transparent, clear, and understood.

Recommendations for Executive Action

To help ensure the resolution of grantee issues, as well as ensure accountability for grantees fulfilling the conditions of their grants, we recommend that the Administrator of OJJDP establish a time frame for fully implementing the requirement established by OJP for grant managers to record in the Grant Management System all actions taken to resolve grantee issues consistent with OJP requirements, standards for internal control, and standard practices for program management.

To help ensure the quality of performance measurement data submitted by grantees and improve these data to support agency and congressional decision making, we recommend that the Administrator of OJJDP take the following actions:
- finalize a data verification approach that includes how it will execute the approach to assess data completeness, accuracy, consistency, and timeliness; and establish time frames for implementing the approach consistent with leading management practices for performance measurement and standard practices for program management; and
- note in each document containing performance measurement data that the limitations of the data are currently unknown as the data have not been verified to help ensure that the information in the communication products OJJDP disseminates is transparent, clear, and understood.

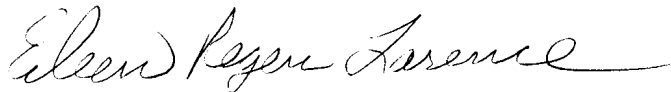**Agency Comments and Our Evaluation**

We requested comments on a draft of this report from the Attorney General. On August 31, 2009, we received written comments from OJP, which are reprinted in enclosure IV. In commenting on the draft report, OJP stated that it concurred with our first recommendation that the Administrator of OJJDP establish a time frame for fully implementing the requirement established by OJP for grant managers to record in the Grant Management System all actions taken to resolve grantee issues. In addition, OJP noted that although in the past OJJDP grant managers have not documented their resolution of grantee issues as required by OJP policy, they have

always been held accountable for resolving grantee performance issues and OJJDP supervisors meet regularly with grant managers to discuss grant management activities. While supervisors may have regularly discussed grant management activities with grant managers, internal control standards for ensuring an agency's accountability for stewardship of government resources require timely and accessible documentation of information. Therefore, to help ensure the resolution of grantee issues, as well as ensure accountability for grantees fulfilling the conditions of their grants, it is important that grant managers also record in the centralized Grant Management System actions taken to resolve grantee issues. To this end, OJP also described efforts it plans to take to implement this recommendation. It stated that beginning in fiscal year 2010, OJJDP will require that grant managers fully record activities in the Grant Management System and include this requirement as a dimension in grant managers' annual performance reviews. In addition, OJP agreed with our recommendations pertaining to performance measurement data and described steps OJJDP plans to take to implement them. By January 2010, OJJDP will develop and implement a plan for verifying performance measurement data, and by October 1, 2009, it will add a note to its performance measures Web site to clarify that performance measurement data have not been verified. OJP also provided technical comments, which we incorporated as appropriate.

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We are sending copies of this report to interested congressional committees and the Attorney General. In addition, this report will be available at no charge on GAO's Web site at http://www.gao.gov.

If you or your staff have any questions concerning this report, please contact me at (202) 512-8777, or larencee@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Mary Catherine Hult, Assistant Director; David Alexander; Katherine Davis; Allyson Goldstein; Dawn Locke; Taylor Matheson; and Janet Temko made key contributions to this report.

Sincerely yours,

Eileen Regen Larence
Director, Homeland Security
and Justice Issues

Enclosure I: Summary of OJP Grant Monitoring Standards and Procedures

While OJP establishes the minimum standards for grant monitoring to which its offices must adhere, direct responsibility for monitoring grantees rests with the components. This enclosure summarizes the minimum standards for programmatic grant monitoring established by OJP at the beginning of fiscal year 2008 that its components are responsible for implementing.[48]

OJP monitoring standards identify five phases in the grant monitoring life cycle. The first two phases—planning and premonitoring—serve to prepare for the subsequent monitoring phases. The planning phase takes place at the beginning of each year, during which each OJP component is to contribute to an OJP-wide annual Monitoring Plan that identifies the grants for which each component intends to conduct site visits during that year. In order to select grants for inclusion in the Monitoring Plan, grant managers are required to use OJP's Grant Assessment Tool to appraise the vulnerabilities associated with grants identified by their component's leadership.[49] Grant managers use the Grant Assessment Tool to determine the risk associated with each grant by assessing each grant against a set of defined criteria. Grant managers then use their discretion to decide whether or not to plan a monitoring site visit for the grant.[50] The Monitoring Plan is an evolving document, and components may use their discretion to modify the grants for which they plan to conduct site visits throughout the course of the year.

The premonitoring phase is intended to help grant monitors obtain the necessary background information to conduct a thorough monitoring site visit. If grant managers plan to conduct a site visit for a grant, OJP standards for premonitoring require that they complete OJP's Pre-Monitoring Checklist, which includes reviewing grant reference materials and notifying the grantee of the visit in writing at least 45 days prior to conducting the visit.

Once grant managers complete the planning and premonitoring phases, they are to move on to the three phases for conducting and following up on monitoring: (1) desk review, (2) site visit, and (3) postsite visit. Table 1 summarizes OJP's minimum standards for these phases.

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[48]These standards are articulated in the *OJP Grant Manager's Manual*. According to OJP officials, as of June 2009, OJP was in the process of revising the current version of this manual, which it expects to complete by the end of fiscal year 2009.
[49]According to OJP officials, in fiscal year 2009 OJJDP's leadership required Grant Assessment Tool assessments for approximately 60 percent of the bureau's open awards during the grant assessment period at the beginning of the year.
[50]These criteria include the dollar value of the award; past performance of the grantee, if applicable; and complexity of the grant program.

Table 1: Summary of OJP's Monitoring and Postmonitoring Phases

Monitoring phase	Processes included in phase	Standards for documentation
1: Desk review— activities to further prepare for monitoring site visits and to facilitate monitoring of grants throughout the award period	Desk reviews are intended to further prepare grant managers for monitoring site visits and to facilitate monitoring of grants throughout the award period. Grant managers are required to complete desk reviews for all grants no less than annually. If a site visit is planned for a grant, a desk review is to be completed no more than 45 days prior to the visit. If a site visit is not planned, a desk review is to be completed at some point during the year. To complete a desk review, grant managers are to review documentation related to the grant, including the application, award documents, and results from previous desk reviews, to ensure a complete understanding of the project objectives, schedule, and status.[a] They are also to review all progress reports submitted by grantees within the last year to determine if the reports are complete and contain information related to the status of the project, such as: • performance measures and associated data as they relate to the grantee's performance in executing the grant program, • progress achieved on each task in relation to any approved schedule, and • any problems or issues encountered in implementing the program and planned actions for resolution. If, after completing a desk review, there is evidence that a site visit is necessary, but one is not planned, the grant manager is to plan a site visit and add the grant to the Monitoring Plan.	Grant managers are required to record desk reviews by uploading a copy of the checklist they use to complete the review in the Grant Management System.
2: Site visit— monitoring to determine how program objectives are being implemented	During site visits, grant managers are to visit a grantee to discuss specific issues related to the grantee's progress in implementing the program, observe grant activity, and assess planned versus actual progress. Site visits are guided by OJP's Site visit checklist, which directs grant managers, through discussion and documentation review, to determine how program objectives are being implemented. This is determined by several questions including the following. • Is there evidence that activities reported have actually occurred, and were reported accurately? • Are project milestones being achieved according to schedule? • Are there any problems implementing the program or is any technical assistance required?	Grant managers are required to record their site visit observations by uploading a copy of the checklist they use to complete the review in the Grant Management System.

3: Postsite visit—activities to record site visit results and resolve grantee issues	Following site visits, grant managers are required to perform several activities. These include • preparing a site visit report that records the results of the site visit, highlights promising practices, and identifies areas where the grantee is not complying with any terms or conditions of the grant or is in need of assistance from OJP; • preparing a follow-up letter to share the results from the visit with the grantee as articulated in the site visit report; • working with the grantee to develop a corrective action plan, if deemed necessary by the grant manager; and • collaborating with the grantee to resolve issues and ensure their resolution. Site visit reports and follow-up letters prepared by grant managers are to receive supervisory approval.	Grant managers are required to record site visit results by saving a site visit report stating their findings in the Grant Management System along with any correspondence submitted by grantees in response to the site visit or site visit report. Grant managers are also required to track any corrective actions taken to resolve issues identified through a site visit and their resolution in the Grant Management System.

Source: GAO analysis of OJP documentation.

Note: Although each of the monitoring activities required by OJP also involves administrative and financial monitoring activities, this summary includes only the required programmatic monitoring activities.

[a]According to the *OJP Grant Manager's Manual*, grant managers are required to use OJP's Desk Review Checklist to complete and record desk reviews. However, according to OJP officials, as of April 2009, OJP policy now also permits grant managers to fulfill the desk review requirement by completing a Grant Assessment Tool assessment. According to OJP, these assessments require grant managers to respond to the same questions as the OJP Desk Review Checklist.

Enclosure II: OJJDP's Performance Measures

As reported by OJJDP, its performance measures provide a system for tracking progress of the chosen activities in accomplishing specific goals, objectives, and outcomes. More specifically, according to OJJDP, performance measurement (1) is directly related to program goals and objectives, (2) measures progress of the activities quantitatively, (3) is not exhaustive, and (4) provides a temperature reading—a quick and reliable gauge of selected results. According to information OJJDP provides to grantees, all recipients of OJJDP funding are required to collect and report data that measure the results of funded activities consistent with GPRA requirements.[51] In its online information for grantees, OJJDP states that according to GPRA reporting performance measures promotes public confidence in the federal government by systematically holding federal agencies accountable for achieving program results. Performance measures also promote program effectiveness, service delivery, and accountability by focusing on results, service quality, and customer satisfaction. Finally, performance measures promote enhanced congressional decision making.[52]

According to the senior OJJDP official who oversees performance measurement, in 2002 OJJDP intensified efforts to develop performance measures to collect and report data that measure the results of funded activities consistent with requirements established by GPRA. Since this time, for each of its grant programs, OJJDP has developed both output and outcome performance measures. According to OJJDP, output measures, or indicators, measure the products of a program's implementation or activities. These are generally measured in terms of the volume of work accomplished, such as the number of services delivered; staff hired; systems developed; sessions conducted; materials developed; and policies, procedures, or legislation created. Examples of OJJDP output measures include the number of juveniles served, number of hours of service provided to participants, number of staff trained, number of detention beds added, number of materials distributed, number of reports written, and number of site visits conducted. Outcome measures, or indicators, measure the benefits or changes for individuals, the juvenile justice system, or the community as a result of the program. Outcomes may be related to behavior, attitudes, skills, knowledge, values, conditions, or other attributes. Examples include changes in the academic performance of program participants, changes in the recidivism rate of program participants, changes in client satisfaction level, changes in the conditions of confinement in detention, and changes in the county-level juvenile crime rate. According to OJJDP, there are two levels of outcomes:

- **Short-term outcomes.** For programs that provide a service directly to juveniles or families, short-term outcomes are the benefits or changes that participants experience by the time they leave or complete the program. These generally include changes in behavior, attitudes, skills, or knowledge. For

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[51]GPRA requires DOJ to collect and report performance measurement data as part of its annual budget process. 31 U.S.C. §§1115-16. Although GPRA only requires collecting and reporting of performance data at the executive agency level, according to OJJDP, as a component of DOJ it assumes responsibility for collecting and reporting on performance data to meet DOJ GPRA requirements.
[52]Due to the volume of OJJDP performance measures—more than 600 in total—we did not assess the quality of these metrics.

programs designed to change the juvenile justice system, short-term outcomes include changes to the juvenile justice system that occur by the end of the grant funding.

- **Long-term outcomes.** The key outcomes desired for participants, recipients, the juvenile justice system, or the community permanently or over an extended period. For programs that provide a service directly to juveniles or families, they generally include changes in recipients' behavior, attitudes, skills, or knowledge. They also include changes in practice, policy, or decision making in the juvenile justice system. They are measured within 6 to 12 months after a juvenile leaves or completes the program and they should relate back to the program's goals (e.g., reducing delinquency).

OJJDP has developed numerous outcome and output measures for each of its formula and block grant programs and for its discretionary grants. OJJDP requires grantees to submit data on a minimum set of specific performance measures that it identifies for each grant program. Additionally, on its Web site, OJJDP provides a list of other measures grantees can opt to use to report on their performance, such as the number of program staff who have completed training in the program area, or the number of program youth who are satisfied with the program. Table 2 describes examples of performance measures provided by OJJDP to its grantees.

Table 2: Examples of Five OJJDP Output and Five OJJDP Outcome Performance Measures

| #	Output measure	Definition
1	**OJJDP grant funds awarded for intervention services (mandatory measure)**	The amount of OJJDP grant funds in whole dollars that are awarded for program intervention services, which are services designed to intervene after a juvenile has become involved in the juvenile justice system. Program records are the preferred data source.
2	**Number of intervention service slots created**	The number of new intervention slots created during the reporting period as a result of OJJDP grant funds. Program records are the preferred reporting source.
3	**Number of youth or youth and families served (mandatory measure)**	An unduplicated count of the number of youth (or youth and families) served by the program during the reporting period. Definition of the number of youth (or youth and families) served for the reporting period is the number of youth (or youth and families) carried over from the previous reporting period plus new admissions during the reporting period.
4	**Number of programs that implement an evidence-based program or practice (mandatory measure)**	Number and percentage of programs that implement an evidence-based program or practice. Evidence-based programs and practices include program models that have been shown, through rigorous evaluation and replication, to be effective at preventing or reducing juvenile delinquency or related risk factors, such as substance abuse. Model programs can come from many sources (e.g., OJJDP's Model Programs Guide, State Model Program resources).
5	**Number of youth or youth and families served by a program with an evidence-based program or practices intervention model (mandatory measure)**	Number and percentage of youth (or youth and families) served using an evidence-based program or practices intervention model. Program records are the preferred source of data.

#	Outcome measure	Definition
1	**Number and percentage of youth or youth and families completing program (mandatory measure)**	Number and percentage of youth (or youth and families) who have successfully met all program obligations and requirements. Program obligations will vary by program, but should be a predefined list of obligations or requirements that clients must meet prior to program completion. Program records are the preferred data source.
2	**Number and percentage of youth exhibiting the desired change in targeted behaviors (short-term) (mandatory measure)**	Must select at least one of OJJDP's 13 suggested measures in this category such as the number of youth who exhibited an increase in their GPA during the reporting period or the number of youth who had completed high school during the reporting period. Short-term data are captured by the time participants leave or complete the program.
3	**Number or percentage of youth who reoffend (short-term) (mandatory measure)**	The number and percentage of youth who were rearrested or seen at a juvenile court for a new delinquent offense. Official records (e.g., police, juvenile court) are the preferred data source. Short-term data are captured by the time participants leave or complete the program
4	**Number or percentage of youth who reoffend (long-term) (mandatory measure)**	The number and percentage of youth who were rearrested or seen at a juvenile court for a new delinquent offense. Long term data are captured 6 to 12 months after program completion.
5	**Number or percentage of youth who are revictimized (mandatory measure)**	The number and percentage of youth who were revictimized. Long-term data are captured 6 to 12 months after program completion.

Source: OJJDP.

Enclosure III: OJJDP's Fiscal Year 2008 Grant Awards

According to OJJDP data, in fiscal year 2008 it awarded approximately $392 million under its formula, block, and discretionary grant programs. As described in figure 2, OJJDP exercised its discretion to select recipients for 45 percent of these funds, and awarded the remaining 56 percent pursuant to a formula or fixed level, or based on direction from Congress.

Figure 2: Selection of Recipients for OJJDP Fiscal Year 2008 Grant Awards
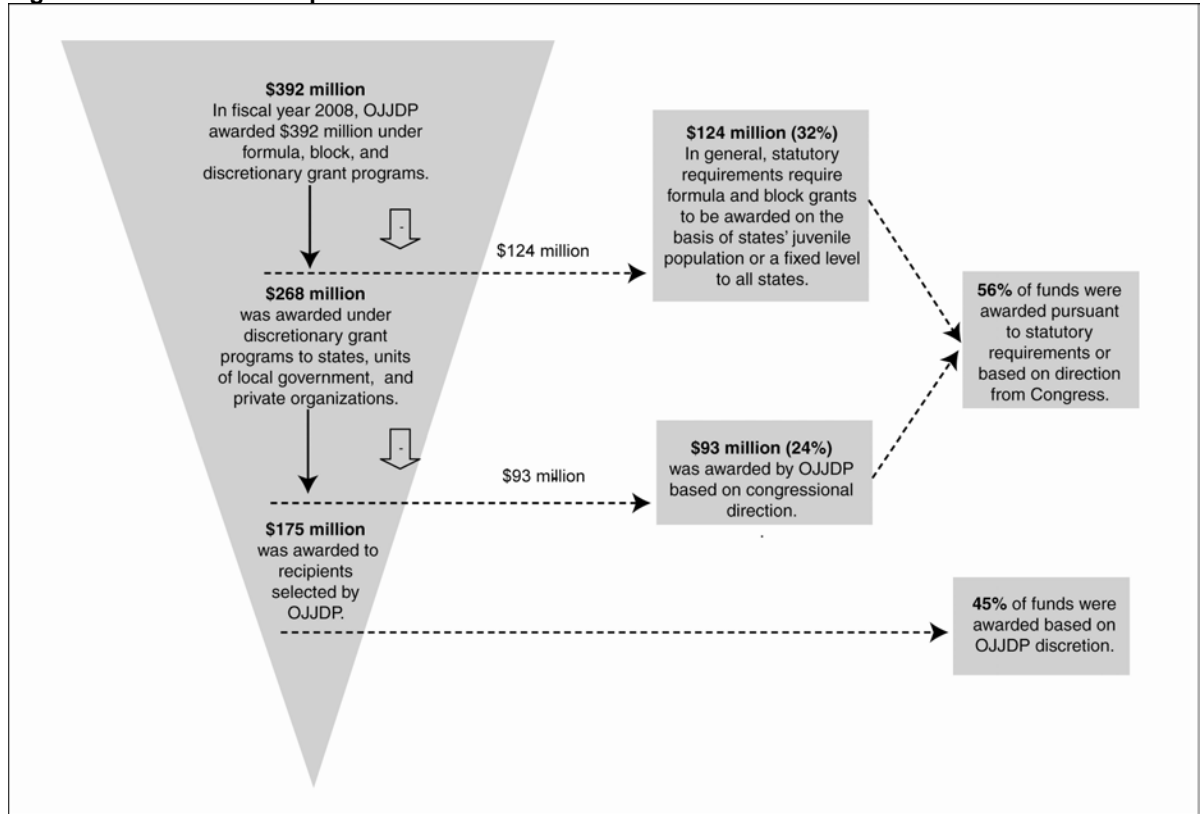
Source: GAO analysis of OJJDP funding data.

Note: Percentages total to greater than 100 due to rounding.

Enclosure IV: Comments from the Department of Justice

U.S. Department of Justice

Office of Justice Programs

Office of the Assistant Attorney General

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Washington, D.C. 20531

AUG 3 1 2009

Ms. Eileen R. Larence
Director, Homeland Security and Justice Issues
Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Larence:

Thank you for the opportunity to comment on the draft Government Accountability
Office (GAO) letter report entitled "Juvenile Justice: A Timeframe for Enhancing Grant
Monitoring Documentation and Verification of Data Quality Would Help Improve
Accountability and Resource Allocation Decisions" (GAO-09-850R). The Office of
Justice Programs (OJP) agrees with the Recommendations for Executive Action, which
are restated in bold text below and are followed by our response.

1. **To help ensure the resolution of grantee issues, as well as ensure accountability
   for grantees fulfilling the conditions of their grants, we recommend that the
   Administrator of OJJDP establish a timeframe for fully implementing the
   requirement established by OJP for grant managers to record in the Grant
   Management System all actions taken to resolve grantee issues consistent with
   OJP requirements, standards for internal control, and standard practices for
   program management.**

OJP agrees with this recommendation. Beginning in Fiscal Year (FY) 2010, OJP's
Office of Juvenile Justice and Delinquency Prevention (OJJDP) will require grant
managers to systematically and fully record grant monitoring activities in the Grants
Management System (GMS). OJJDP will include the requirement in the performance
work plans for grant managers.

Of the 316 site visits conducted in FY 2008, 109 site visits required follow-up with the
grantee after the site visit. Although grant monitoring documentation was not included in
GMS or in the format prescribed by OJP policy, OJJDP grant managers followed up with
grantees to address issues noted during site visits. Further, OJJDP grant managers have
always been held accountable for grant monitoring responsibilities and resolving grantee
performance issues. OJJDP supervisors meet regularly with grant managers to discuss
workload and grant management activities, which encompass more than site visits.

2. **To help ensure the quality of performance measurement data submitted by grantees and improve these data to support agency and congressional decision-making, we recommend that the Administrator of OJJDP:**

- **finalize a data verification approach that includes how it will execute the approach to assess data completeness, accuracy, consistency, and timeliness; and establish timeframes for implementing the approach consistent with leading management practices for performance measurement, and standard practices for program management; and**
- **note in each document containing performance measurement data that the limitations of the data are currently unknown as the data have not been verified to help ensure that the information in the communication products that OJJDP disseminates is transparent, clear, and understood.**

OJP agrees with this recommendation. OJJDP is in the process of auditing and refining its performance measures. Once that process is complete, by January 2010, OJJDP will develop and implement a plan for verifying performance measurement data. In addition, by October 1, 2009, OJJDP will add a note to its performance measures website to clarify that performance measurement data has not been verified.

If you have any questions regarding this response, you or your staff may contact Maureen Henneberg, Director, Office of Audit, Assessment, and Management, on (202) 616-3282.

Sincerely,

Laurie O. Robinson
Acting Assistant Attorney General

cc: Beth McGarry
       Deputy Assistant Attorney for Operations and Management

       Jeffrey Slowikowski
       Acting Director
       Office of Juvenile Justice and Delinquency Prevention

       Maureen Henneberg
       Director
       Office of Audit, Assessment, and Management

       LeToya A. Johnson
       OJP Audit Liaison

       Richard P. Theis
       Audit Liaison
       Department of Justice

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