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Since 1969 the Law Enforcement Assistance Administration (LEAA) has awarded over \$5 billion to State and local governments to reduce crime and delinquency. There have been various attempts to evaluate the impact and effectiveness of programs receiving these funds. Findings/Conclusions: Evaluation activities of LEAA and the States have been inadequate to meet planning, decisionmaking, and policymaking needs of many users concerned with the intergovernmental block grant crime control program. For example: the amount and types of evaluation work have not been adequate, the quality of evaluation work was questionable, evaluation information needs of users were not being met, resources allocated for evaluation were inadequate, organization of evaluation functions lacked direction and effective management controls, and better coordination of evaluation program efforts was needed. LEAA should place greater emphasis upon building evaluation into programs and projects before they are started at the Federal, State, and local levels, and exercise greater leadership. Recommendations: The Congress should consider expanding LEAA's research, development, demonstration, and evaluation role, with greater involvement from State and local governments. The Attorney General should direct LEAA to provide for substantive involvement of State and local officials in formulating evaluation policies, guidelines, and requirements. Such efforts should include establishing an evaluation coordinating committee and assessing evaluation information feedback needs of States and localities periodically. The Attorney General should direct the Administrator of LEAA to: provide for the organizational placement of evaluation responsibilities minimally at the Deputy Administrator level and provide for additional resources for evaluation functions; increase the priority emphasis of

research and development efforts; develop reliable data bases, evaluation measures, and assessment criteria to determine the impact of programs; develop and require standardized reporting systems; standardize quality control; and develop and implement impact evaluation information and reporting systems. The Attorney General should examine and consider proposing options for changes in legislation. (HTW)

7091

BY THE COMPTROLLER GENERAL

# Report To The Congress

OF THE UNITED STATES

## Evaluation Needs Of

- Crime Control Planners,
- Decisionmakers, And
- Policymakers

## Are Not Being Met

Since 1969 the Law Enforcement Assistance Administration has awarded over \$5 billion to State and local governments to reduce crime and delinquency. There have been various attempts to evaluate the impact and effectiveness of programs receiving these funds.

However, much of the evaluation information generated has been of little utility in meeting the planning, decisionmaking, and policy-making needs of users at different levels within this intergovernmental program.

Greater emphasis upon (1) building evaluation into programs and projects before they are implemented and (2) providing sufficient resources to support evaluation activities is needed at Federal, State, and local levels.



GGD-77-72  
JULY 14, 1978



COMPTROLLER GENERAL OF THE UNITED STATES

WASHINGTON, D.C. 20548

B-171019

To the President of the Senate and the  
Speaker of the House of Representatives

This report analyzes efforts by the Law Enforcement Assistance Administration and the States to evaluate the effectiveness and impact of projects and programs designed to prevent, control, and reduce crime and delinquency and to improve the criminal justice system. Overcoming problems in obtaining objective, valid, and timely evaluation information is vital if planners, decisionmakers, and policymakers are to identify programs and projects that work and merit continuation.

We made this review because of continuing congressional interest in the Omnibus Crime Control and Safe Streets Act Program and the importance of the role of evaluation in fostering improvements in the crime control and criminal justice areas. Our review was made pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C. 67).

We are sending copies of this report to the Director, Office of Management and Budget, and the Attorney General.

A handwritten signature in black ink, reading "Thomas B. Steeds".

Comptroller General  
of the United States

COMPTROLLER GENERAL'S  
REPORT TO THE CONGRESS

EVALUATION NEEDS OF  
-CRIME CONTROL PLANNERS,  
-DECISIONMAKERS, AND  
-POLICYMAKERS ARE NOT BEING  
MET

D I G E S T

Over five billion dollars has been awarded in the past decade by the Law Enforcement Assistance Administration to State and local governments to help prevent, control, and reduce crime and juvenile delinquency and/or to improve criminal justice in the United States.

What have been the results?

To what extent has performance of criminal justice system agencies been improved?

Which specific programs and strategies have been effective? Which have not?

Answers to these questions are needed by Federal, State, and local officials who are responsible for developing plans, making decisions, and formulating or changing policies regarding programs designed to prevent, control, and reduce crime and juvenile delinquency.

However, it is not clear that the Law Enforcement Assistance Administration and the States are any further along since the reenactment of the Omnibus Crime Control and Safe Streets Act of 1973 in

--knowing which specific program and project strategies have been successful and, especially, which have not in reducing crime and improving criminal justice system performance; or in

--determining what cumulative impact Federal financing may have had on the effectiveness and efficiency of Federal,

State, and local government programs and services to these ends.

A cogent, systematic approach to finding the answers through evaluation is necessary to provide the objective, valid, and reliable information decisionmakers and policymakers in Federal, State, and local governments must have to plan and carry out effective crime control programs.

Sufficient, timely evaluation information is vital to identifying

--what works,

--how well it works,

--what effect it has, and, importantly,

--what does not work and why not.

Strategies designed to prevent, control, and reduce crime and juvenile delinquency and/or improve the performance of criminal justice systems must be tested to identify which ones, if any, will lead to attainment of the national goal of increasing public safety.

This report provides the Congress information resulting from GAO's analyses of the Law Enforcement Assistance Administration's and the States' evaluation activities and information.

The concept of evaluation as used in this review is defined by GAO as: a systematic procedure which attempts to appraise and measure the actual inputs, processes, outcomes, and operational settings of one or more ongoing programs or policies in order to compare these findings with those which were anticipated or assumed. It then seeks to explain the discovered differences and to suggest alternatives for improvement. (See ch. 1.)

In particular, GAO

- determines whether and to what extent the Law Enforcement Assistance Administration acted on previous GAO recommendations to improve the evaluation of programs and activities it supports;
- assesses to what extent these actions improved Law Enforcement Assistance Administration and State evaluation activities and information; and
- discusses evaluation problems the Law Enforcement Assistance Administration and the States experienced and those they still must overcome to improve the effectiveness and impact of federally assisted crime control efforts.

GAO work was performed in late 1975 and early 1976 at Law Enforcement Assistance Administration headquarters, four of its regional offices, and in four States.

#### FINDINGS

The following examples show why Law Enforcement Assistance Administration and States evaluation activities and information are not meeting planning, decision-making, and policymaking needs of many users concerned with the intergovernmental block grant crime control program.

- The amount and types of evaluation work have not been adequate. Three of the four States GAO visited did not have fully established evaluation programs and were not meeting requirements for maintaining an adequate evaluation capability. (See pp. 26 to 33 and ch. 3.)
- The quality of evaluation work was questionable. GAO's analysis of a sample of evaluation reports indicates evaluation findings, conclusions, and recommendations frequently are imprecise, and evaluation work performed has significant deficiencies. (See ch. 4.)

- Evaluation information needs of users were not being met. Few decisionmakers are consulted in advance by the Law Enforcement Assistance Administration and State planning agencies to identify and define their evaluation information needs. None of the four States GAO visited had established systematic procedures for dissemination and timely feedback of evaluation results for decisionmaking, comprehensive planning, and policy formulation. Much information which had been generated was of limited utility. Consequently, policies made at State and local levels regarding continued Federal funding or assumption of costs by States or localities frequently are unaffected by evaluation results. (See ch. 5.)
  
- Resources allocated for evaluation were inadequate. In fiscal year 1975 the States collectively allocated, for evaluation purposes, less than 1 percent of the Law Enforcement Assistance Administration funds available to them. For fiscal year 1976, the Law Enforcement Assistance Administration allocated less than 60 percent of the evaluation funding recommended by its 1974 Evaluation Policy Task Force. (See pp. 116 to 124.)
  
- Organization of evaluation functions lacks direction and effective management controls. State planning agencies' management and planning processes do not systematically incorporate evaluation activities and results. Decisions to conduct and use evaluations are not based on State comprehensive planning needs. There is little or no integration of evaluation activities into the State planning agencies' overall management structures. Placement of administrative direction of evaluation functions is too far removed from top management in the Law Enforcement Assistance Administration and the States to be effective. (See pp. 134 to 146.)
  
- Better coordination of evaluation program efforts is needed. Problems in coordinating



evaluation activities were identified at national, State, and local levels. Limited State and local participation in Law Enforcement Assistance Administration evaluation program decisions and inadequate assessment of State and local users' needs restrict the efficacy of Law Enforcement Assistance Administration evaluation initiatives. (See ch. 7.)

### CONCLUSIONS

The Law Enforcement Assistance Administration must place greater emphasis upon building evaluation into programs and projects, before they are started at the Federal, State, and local levels. It must exercise greater leadership by providing assistance and coordination of evaluation functions and activities, both within its organization and between it and the States, regional planning units, and local governments to make sure that the needs of those who use evaluation information are met.

A summary (vol. I) accompanying this report synthesizes GAO's findings, conclusions, and recommendations. Issues discussed are complex and often interrelated; consequently, GAO's recommendations are not restricted to one or two areas, but frequently focus collectively on these interdependent problems.

### MATTERS FOR CONSIDERATION BY THE CONGRESS

Since Law Enforcement Assistance Administration funds constitute a small proportion of all government crime reduction and criminal justice expenditures, consideration could be given to expanding the Law Enforcement Assistance Administration's research, development, demonstration, and evaluation role, but with greater involvement and conceptual input from the State and local governments in decisions and policies affecting the scope and direction of such activities on a direct

basis. A significant increase in the amount of the Federal investment may not be necessary. However, a different system of allocating discretionary and block grant funds might be necessary. 1/

A national strategy to reduce crime using this approach would build upon program efforts which, based upon rigorously controlled research, are proven to produce a significant crime reduction outcome. States and localities could participate in the planning, implementation, and management of those projects proven to have merit.

Systematically planned variation in program approaches, which "build in" the evaluation research requirements before undertaking individual projects, would be emphasized.

Those efforts which have empirically demonstrated crime reduction payoffs could then be funded under differing State and local conditions with continued evaluation of their relative effectiveness. Programs and component projects which have proven successful in different locales could then be assumed by additional States and localities with increased confidence because of their demonstrated impact on crime and delinquency problems.

#### RECOMMENDATIONS

The Attorney General should direct the Law Enforcement Assistance Administration

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1/See GAO's staff study, "Federal Crime Control Assistance: A Discussion of the Program and Possible Alternatives," GGD-78-28, Jan. 27, 1978; pp. 108 to 116, for an expanded discussion of this approach.

to provide for the substantive involvement of State and local officials in formulating evaluation policies, guidelines, and requirements. Such efforts should include:

- Establishing an evaluation coordinating committee composed of representatives from the Department of Justice, the Law Enforcement Assistance Administration, State planning agencies, regional planning units, local governments, criminal justice agencies, and private citizens to better coordinate and use evaluation programs, services, and results.
- Systematically assessing evaluation information feedback needs of States and localities periodically, but at least annually.

To insure that sufficient resources are available to carry out evaluation responsibilities and to improve management of evaluation functions, the Attorney General should direct the Administrator to provide for the organizational placement of Law Enforcement Assistance Administration evaluation responsibilities and authority minimally at the Deputy Administrator level. He should also strengthen the evaluation capabilities at Federal, State, and local levels, by providing additional resources to plan, design, and carry out evaluations and to use evaluation information effectively.

To accomplish this, the Law Enforcement Assistance Administration needs to:

- Recruit and allocate additional qualified evaluation personnel to help the States, regional planning units, and local governments develop and use evaluation processes and results.
- Expand technical and management assistance and training in evaluation provided to States and localities.

--Issue guidelines requiring the States to provide sufficient funds for evaluation and mandate the use of these funds for evaluation purposes only.

The Attorney General, to improve the quality and utility of evaluation results and information in a cost effective manner, should direct the Administrator to:

- Increase the priority of the Administration's research and development efforts and focus such efforts upon providing valid and reliable measures of crime and criminal justice system performance and related tools and methodological techniques for determining the crime reduction impact, relative effectiveness, and side effects of programs and projects financed by the Law Enforcement Assistance Administration and the States.
- Develop standardized, uniform, valid, and reliable data bases, evaluation measures, and assessment criteria to determine the impact of a variety of programs on defined target populations of potential victims and offenders and for defined geographic areas.
- Stimulate and increase the use of program-level and outcome evaluations, to generate valid and comparable information about the success rates and costs for projects which have different strategies but are designed to achieve the same or similar end results.
- Develop and require standardized reporting systems for evaluation and, in conjunction with the States, develop criteria for determining what to evaluate and for specifying appropriate levels of evaluation to meet a variety of evaluation users' needs.
- Standardize the quality control of evaluation processes and results to insure comparability, reliability, and validity of information generated for decisionmaking and planning.

--Develop and implement, in conjunction with the States, impact evaluation information and reporting systems, previously recommended by GAO, to promote increased dissemination and timely feedback of evaluation results.

The Attorney General should also examine and consider proposing one or a combination of the following options for changes in the legislation to be considered by the Congress:

#### Funding for evaluation

--Establish a separate part in the legislation which mandates an adequate amount of funds which may be used for evaluation purposes only.

--Mandate that a certain percentage of funds be set aside by the States for evaluation purposes only. The funds would not be subject to pass-through and matching fund requirements.

--Require the Law Enforcement Assistance Administration to allocate more of its discretionary funds to the States to develop and maintain more effective evaluation capability.

#### Program evaluation advisory council

--Provide for the establishment of a program evaluation advisory council to (1) provide consultation and assistance to the Law Enforcement Assistance Administration, (2) review evaluation programs, policies, and plans, and (3) advise the Attorney General and the Administrator of the Law Enforcement Assistance Administration. The Office of Management and Budget, the National Academy of Sciences, the Office of Science and Technology, criminal justice research organizations, State planning agencies, regional planning units, and local governments should be represented on the council.

## ANALYSIS OF COMMENTS RECEIVED

While the Department of Justice is not in substantive disagreement with GAO's conclusions overall, it believes it has taken steps to deal with some of the problems noted by GAO. (See app. I.) However, given the current debate over the appropriate structure and thrust of Law Enforcement Assistance Administration programing, the question remains as to whether recent agency initiatives in evaluation will

- be fully implemented;
- have demonstrative effect on the quantity, quality, and utility of State and local evaluation efforts; and
- will meet the evaluation information needs of a variety of users at different levels in the intergovernmental Crime Control Act program.

Copies of the draft report were provided to the State planning agencies in each of the four States. Their comments were considered in the report and changes to the report have been made where appropriate. Generally, the States agreed with GAO's conclusions. An analysis of agency comments and the Department of Justice's response to GAO recommendations is presented in chapter 8.

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## ABBREVIATIONS

ACIR	Advisory Commission on Intergovernmental Relations
GAO	General Accounting Office
LEAA	Law Enforcement Assistance Administration
NEP	National Evaluation Program
OJJDP	Office of Juvenile Justice and Delinquency Prevention
OMB	Office of Management and Budget
RPV	Regional Planning Unit
SPA	State Planning Agency

## CHAPTER 1

### INTRODUCTION

The Law Enforcement Assistance Administration (LEAA) awarded over \$5 billion between fiscal years 1969 and 1978 to State and local governments to prevent, control, and reduce crime and juvenile delinquency and/or to improve the criminal justice system. The funds financed the operation of well over 100,000 grants.

What impact have these funds had on crime, delinquency, and the performance of the criminal justice system? Which specific strategies and programs have been effective in reducing, controlling, and preventing crime and delinquency, and which have not?

The Congress, in enacting the Omnibus Crime Control and Safe Streets Act of 1976, (hereafter referred to as the Crime Control Act), expressed its continuing concern for evaluation in declaring that constructive Federal aid and assistance be given to State and local governments in obtaining answers to these questions. Before passing this act, committees of the Congress examined important issues and alternative actions when it considered the reauthorization of the Crime Control Act and LEAA. Consequently, the Senate Committee on Governmental Affairs requested information on, and the results of our examination and analysis of LEAA and State evaluation efforts. The Committee was particularly interested in whether and to what extent our previous recommendations for improving program evaluation activities and information had been implemented.

#### WHY EVALUATION IS NECESSARY

A cogent, systematic approach to evaluation is necessary to answer the above questions. Persons responsible for planning, decisionmaking, and policymaking functions involving the allocation of funds for preventing, controlling, and reducing crime and delinquency and/or improving the performance of the criminal justice system need objective, valid, and reliable information which identifies and differentiates between those program strategies which are effective and those which are not. The concept of evaluation as employed in the context of our review is defined as:

"A systematic procedure which attempts to appraise and measure the actual inputs, processes, outcomes, and operational settings of one or more on-going programs or policies in order to compare these

findings with those which were anticipated or assumed. It then seeks to explain the discovered differences and to suggest alternatives for improvement." 1/

Evaluation information users are found at all levels of government, as well as in the private sector and the public. Typical user groups include but are not limited to:

- Members of Congress, its committees, and subcommittees.
- Executive and legislative branch agencies (for example, the Office of Management and Budget (OMB), GAO, and the Congressional Research Service).
- Governors, heads of State executive branch agencies, and their staffs.
- State legislators and State legislative branch agencies, including legislative audit.
- State budget directors.
- County supervisors and other local government officials.
- Mayors and city councilmen.
- Private citizens.

There are also user groups that are more directly involved and that are concerned primarily with crime, delinquency, and the administration of justice. These evaluation information users include:

- State planning agency (SPA) supervisory board members.
- SPA directors and staff.
- State criminal justice agency heads.
- Regional planning units (RPUs) supervisory and advisory boards and councils.

1/See our publication, "Evaluation and Analysis To Support Decisionmaking," PAD-76-9, Sept. 1, 1976, for a discussion of the analytical continuum subsumed by the term "evaluation."

- RPU directors and staff.
- County and city criminal justice coordinating council members.
- County and municipal planning units.
- Local criminal justice agency heads.
- Grantees and subgrantees.
- LEAA and National Institute of Law Enforcement and Criminal Justice personnel.
- Researchers and university academicians.
- Public and private interest groups.

A number of decisionmaking and policymaking processes occur as part of the block grant Crime Control Act Program involving Federal, State, and local governments and agencies. However, these processes share a principal problem: resource allocation. The key elements of the problem involve:

- Achieving government objectives by developing, adopting, and implementing policies involving the creation and operation of programs which necessitate consuming or transferring resources--be they tangible or intangible.
- Identifying and setting priorities among public needs in the context of constantly changing and increased demand for resources which are no longer available on an increasing basis.
- Choosing, from among competing objectives, alternative policies, and programs, those deemed most capable of meeting the needs and goals at desired and affordable levels of achievement.

Decisionmakers are involved in the process of allocating resources among competing demands to achieve the greatest possible level of net benefits; at the same time they consider the requirements of justice, equity, and political reality.

In solving the resource allocation problem, several actions are possible:

1. Continue, modify, or abandon existing policies and/or adopt new policies.

2. Continue, modify, expand, reduce, or phase out current programs and/or create new ones.

Evaluation can and should be an integral part of the management, planning, and decisionmaking processes of LEAA, SPAs, RPUs, and local governments.

Outcome evaluation is particularly necessary to decision-makers, planners, and those responsible for formulating and/or changing criminal justice program policies and establishing priorities for funding consideration. Outcome evaluation is designed to objectively determine a program's progress toward an overall goal; e.g., reduction of new offenses through successful criminal rehabilitation.

Outcome evaluations differ from other forms of assessment, such as the following:

- A fiscal or operational review to determine compliance with contracted obligations.
- A subjective review ("expert" opinion) of the merit of the procedures used.

Outcome evaluations--even though providing useful information to gauge program performance--can serve as an objective impetus for improvement only if they can be, and are used as a basis for comparing the effectiveness of programs, formulating appropriate policy, and planning and implementing program changes.

Without the objective information provided by evaluations, especially outcome evaluations, users cannot:

- Identify the most cost-effective way to achieve goals.
- Plan similar programs and develop potentially more effective and efficient projects.
- Incorporate the information provided by evaluations to modify, expand, or limit the scope and direction of ongoing or anticipated new projects and larger program efforts.
- Anticipate the side effects generated by one specific or several projects in advance, to minimize disruption and counterproductive outcomes in another area or program effort.

- Make appropriate decisions about refunding a project or program.
- Formulate or change administrative and/or system-wide policies, procedures, and practices.
- Effectively allocate sufficient and appropriate dollar amounts to program areas having the greatest potential crime reduction and/or system improvement payoff.
- Anticipate needed changes in criminal laws and procedures.
- Develop standards to gage the performance of the criminal justice system and to provide improvements to ongoing operations.
- Retain and support locally, successful programs and projects when Federal funding ends.

Chapter 5 presents, in detail, our findings and conclusions concerning the adequacy and effectiveness of LEAA and State evaluation efforts in meeting the needs of various users in the intergovernmental Crime Control Act Program.

PREVIOUS GAO FINDINGS AND RECOMMENDATIONS  
ON LEAA AND STATE EVALUATION EFFORTS

In previous reports (see app. II) we examined LEAA and State evaluation efforts and the information they generated. LEAA and the States could not identify which approaches for preventing, controlling, and reducing crime and delinquency had been successful, under different conditions, for different target areas or groups of individuals. Much of this problem had been due to an absence of, and inadequate concern for, evaluating the outcome, impact, and relative effectiveness of funded programs.

One report identified certain difficulties with LEAA and SPA attempts to assess the impact and effectiveness of various types of projects. 1/ We recommended that the Attorney General direct LEAA, in cooperation with the States, to (1) designate several projects from each type of LEAA-funded

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1/"Difficulties of Assessing Results of LEAA Projects to Reduce Crime," Mar. 19, 1974, B-171019.

program as demonstration projects and (2) determine information that should be gathered and the type of evaluations to be done to establish for similar projects:

- Guidelines relating to goals, the type of staff that could be employed, the range of services that could be provided, and expected ranges of costs.
- Uniform information to be gathered.
- Standard reporting systems.
- A standard range of expected accomplishments that could be used to determine if similar projects were effective.
- Standardized evaluation methods that should be used so the impact of similar projects can be compared.

We further recommended that the Attorney General direct LEAA to:

- Establish an impact information and reporting system (involving the 55 SPAs) which LEAA-funded projects must use to report to their SPAs on project effectiveness.
- Require States, once such a system is established, to develop, as part of their State plans, a system for approving individual project evaluations only when such efforts will not duplicate information already available from the impact information system.
- Publish annually, for the major project areas, the results obtained from the impact information system so the Congress and the public can assess the LEAA program's effectiveness.

The remedial actions we wanted LEAA and the States to take involved:

1. Stimulating the use of "program-level evaluation" to generate comparable information about the rate of success and costs for projects which have different strategies but which are designed to achieve the same or similar end results. 1/

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1/Program-level evaluation involves simultaneous assessment of projects which, minimally, share common outcome objectives.



2. Development of standardized, uniform, valid, and reliable data bases to assess the impact of a variety of project efforts upon defined target populations of potential victims and offenders and for defined geographic areas.
3. Standardized reporting systems to permit the comparison of project results within and between program areas through use of standardized measures and assessment criteria.
4. Standardization and quality control of evaluation methodologies and reporting to insure comparability, reliability, and validity of results for decisionmaking and planning.

#### Developing and using evaluation results in planning and decisionmaking processes

In other reports we have reemphasized the need for more and better outcome evaluations and the incorporation of the results of such evaluations in decisionmaking and planning activities at Federal, State, and local levels. We recommended that the Attorney General direct LEAA to specify guidelines and requirements to the States in the implementation and use of evaluation, requiring the States to:

- Specify how State criminal justice planning administrators plan to use evaluation in decisionmaking processes.
- Identify the degree to which these administrators are satisfied with current evaluation strategies or believe they need to be modified so evaluation results will be useful in decisionmaking and planning processes.

Agency actions on these recommendations are discussed in relation to findings and conclusions presented in succeeding chapters.

#### SCOPE AND OBJECTIVES OF REVIEW

Our work was performed at LEAA headquarters, four LEAA regional offices (Region III--Philadelphia, Region VII--Kansas City, Region IX--San Francisco, and Region X--Seattle), and four States (Pennsylvania, Kansas, California, and Oregon), and at selected RPU's in two of the four States.

We made the review to (1) determine whether LEAA had addressed the evaluation-related recommendations in our previous reports and (2) assess the extent to which evaluation work and operations of LEAA and the States had improved. In addition, we focused on determining:

- Whether LEAA and the States were complying with the intent of the Congress in its provisions for evaluation in the Crime Control Act.
- How adequate, sufficient, and timely evaluation efforts and products had been in meeting users' needs.
- To what extent evaluations were used and were useful in State and local planning, decisionmaking, and policymaking.
- How effectively LEAA and the States had allocated and managed evaluation resources and practices.
- The effectiveness of LEAA efforts to assist the States and to coordinate Federal, State, and local evaluation resources, programs, and services.

We reviewed the past, present, and planned LEAA, State, and selected RPU evaluation efforts and results and examined a sample of evaluations performed by SPAs, RPUs, subgrantees, and third-party contractors. We also questioned key State government decisionmaking and policymaking officials in six States about recent LEAA and State evaluation activities, services, and information. Finally, we interviewed officials at LEAA headquarters; LEAA regional offices; the Pennsylvania, Kansas, California, and Oregon SPAs; selected RPUs in two States; and evaluation research professionals.

## CHAPTER 2

### AN OVERVIEW OF LEAA AND STATE EVALUATION EFFORTS

#### INVOLVEMENT AND LEGISLATIVE MANDATE FOR EVALUATION AT THE FEDERAL LEVEL

Congressional concern over the growing crime rate of the 1960s and the apparent inability of the criminal justice system to deal effectively with the problem led to passage of the Omnibus Crime Control and Safe Streets Act of 1968.

The act established LEAA within the Department of Justice to give the States both financial and technical assistance to improve their criminal justice systems. The act authorized LEAA to carry out such programs through fiscal year 1973 and specified funding levels through fiscal year 1970. A 1971 amendment specified funding through fiscal year 1973. In August 1973 the Congress passed the Crime Control Act of 1973 which extended LEAA's operational authority and specified funding through June 30, 1976. In 1976 the Congress reauthorized this program through 1979.

Under the 1968 act and subsequent legislation, LEAA makes grants to State and local governments for:

- SPAs to plan and develop statewide comprehensive plans for improving the criminal justice system in each State, subject to approval by LEAA, before the State can receive funds.
- Implementing projects which conform to State comprehensive plans.

These funds are initially awarded to the SPA in the form of a block grant; the amount depends on the size of each State's population. State agencies and local governments must apply to the SPA for funds. LEAA also has authority to fund and conduct projects as it considers appropriate. Such grants are called discretionary grants.

Block and discretionary grants funded under parts C and E of the act are called action grants. Of the funds appropriated for action grants, 85 percent are allocated to the States as block grants. From fiscal year 1969 to 1978, LEAA has awarded the States over \$4.4 billion in block grants.

The 1968 act also established within LEAA the National Institute of Law Enforcement and Criminal Justice. The National Institute's purpose was " \* \* \* to encourage research and development to improve and strengthen law enforcement" by conducting in-house research and by awarding grants and contracts for research to public agencies, universities, or private organizations.

Both the 1968 act and the 1971 amendment authorized but did not require LEAA and the National Institute to evaluate the effectiveness of the programs funded. Likewise, the States were not required to evaluate; they were required merely to provide for research and development in their annual plans.

However, congressional disillusionment with LEAA's failure to aggressively use its evaluation authority led to a mandate in the 1973 Crime Control Act requiring the National Institute to evaluate the impact of LEAA programs. Section 402 of the 1973 act mandated that:

"The Institute shall undertake, where possible, to evaluate the various programs and projects carried out under this title to determine their impact upon the quality of law enforcement and criminal justice and the extent to which they have met or failed to meet the purposes and policies of this title; and shall disseminate such information to State planning agencies and upon request, to units of general local government.

The Congress recognized the sensitivity of the National Institute's evaluation role and expected the National Institute "to refer to" an "advisory committee or other agency which was representative of every level of government as well as knowledgeable persons from academic and civic segments of our society."

In addition, the Juvenile Justice and Delinquency Prevention Act of 1974, which established the Office of Juvenile Justice and Delinquency Prevention (OJJDP) within LEAA, provided for the thorough and prompt evaluation of all federally assisted juvenile delinquency programs. The law requires the Administrator of LEAA to (1) conduct and support evaluations and studies of the performance and results achieved by Federal juvenile delinquency programs and activities and (2) determine what performance and results might be achieved

by alternative programs and activities supplementary to or in lieu of those currently being administered.

Furthermore, the 1974 act established a separate National Institute for Juvenile Justice and Delinquency Prevention, hereafter referred to as the Juvenile Justice Institute, which is empowered to provide for the evaluation of all juvenile delinquency programs assisted under the title, to determine the results and effectiveness of programs and to disseminate the results of such evaluations to persons actively working in the field of juvenile delinquency.

Following the enactment of the Crime Control Act of 1973, the Administrator of LEAA established an Evaluation Policy Task Force in November 1973. Members were appointed from various organizational units within LEAA and included representatives of four SPAs, assisted by a technical advisor from a private nonprofit research organization.

The Administrator directed the task force to develop a comprehensive evaluation program for the agency by building on previous agency evaluation efforts and by responding directly to the evaluation requirements of the new act. The Administrator established the following objectives for the task force:

1. To review the current level of evaluation activity carried out by all LEAA offices and SPAs.
2. To develop a common understanding of what is meant by "evaluation," including both the form and the function of activities to be included (and excluded) under the term.
3. To develop evaluation goals and objectives for each part of the LEAA structure, including SPAs, that are mutually supporting and contribute to an overall agency evaluation goal.
4. To formulate by March 1, 1974, for the Administrator's review, alternative program plans to implement the proposed goals, addressing:

--Appropriate evaluation task statements for LEAA offices and the SPAs.

--Appropriate SPA evaluation guidelines to be promulgated by the Administrator to supplant or supplement the existing guidelines.

--Appropriate funding mechanisms to implement the guidelines and program goals.

--Appropriate training and technical assistance programs to implement the guidelines and program goals.

5. To oversee the development of a series of alternative models for the SPAs to use in setting up their evaluation programs.

The task force completed its work and submitted a final report to the Administrator, as scheduled, on March 1, 1974. The task force formulated three general evaluation goals for LEAA.

--To develop information on the effectiveness of criminal justice programs and practices--a knowledge goal.

--To have all LEAA program managers employ management practices which use evaluative information in formulating and directing their activities--a management goal.

--To encourage all criminal justice system agencies to develop and use such evaluation capabilities--a development goal.

The major organizational changes in LEAA which resulted from the recommendations included (1) the establishment of an Office of Evaluation in the National Institute, (2) the establishment of planner-evaluator positions in each of the 10 LEAA Regional Offices (which were closed September 30, 1977), and (3) the acquisition of evaluation responsibilities by several other LEAA headquarters units.

The Office of Evaluation (now two offices--Office of Research and Evaluation Methods and the Office of Program Evaluation) was held responsible for initiating many of the new programs and activities in evaluation. Other LEAA offices which assumed new evaluation responsibilities included the Office of Research Programs and what is now the Office of

Development, Testing, and Dissemination in the National Institute, the Office of National Priority Programs (now part of the Office of Criminal Justice Programs), the National Criminal Justice Information and Statistics Service, and the Office of Planning and Management.

Before the Evaluation Policy Task Force was established in November 1973, the only major programmatic evaluation initiatives then underway in LEAA were the evaluations of the Pilot Cities Demonstration and High Impact Anti-Crime Programs, although some individual discretionary fund projects had evaluation components. 1/

LEAA organizational units having evaluation responsibilities at the time of our review are indicated by an asterisk in the chart on the following page.

### LEAA'S EVALUATION PROGRAMS

Evaluation responsibilities, functions, program activities, and procedures have been assumed by, and in certain instances specifically assigned to, a number of different units within LEAA.

#### National Institute of Law Enforcement and Criminal Justice

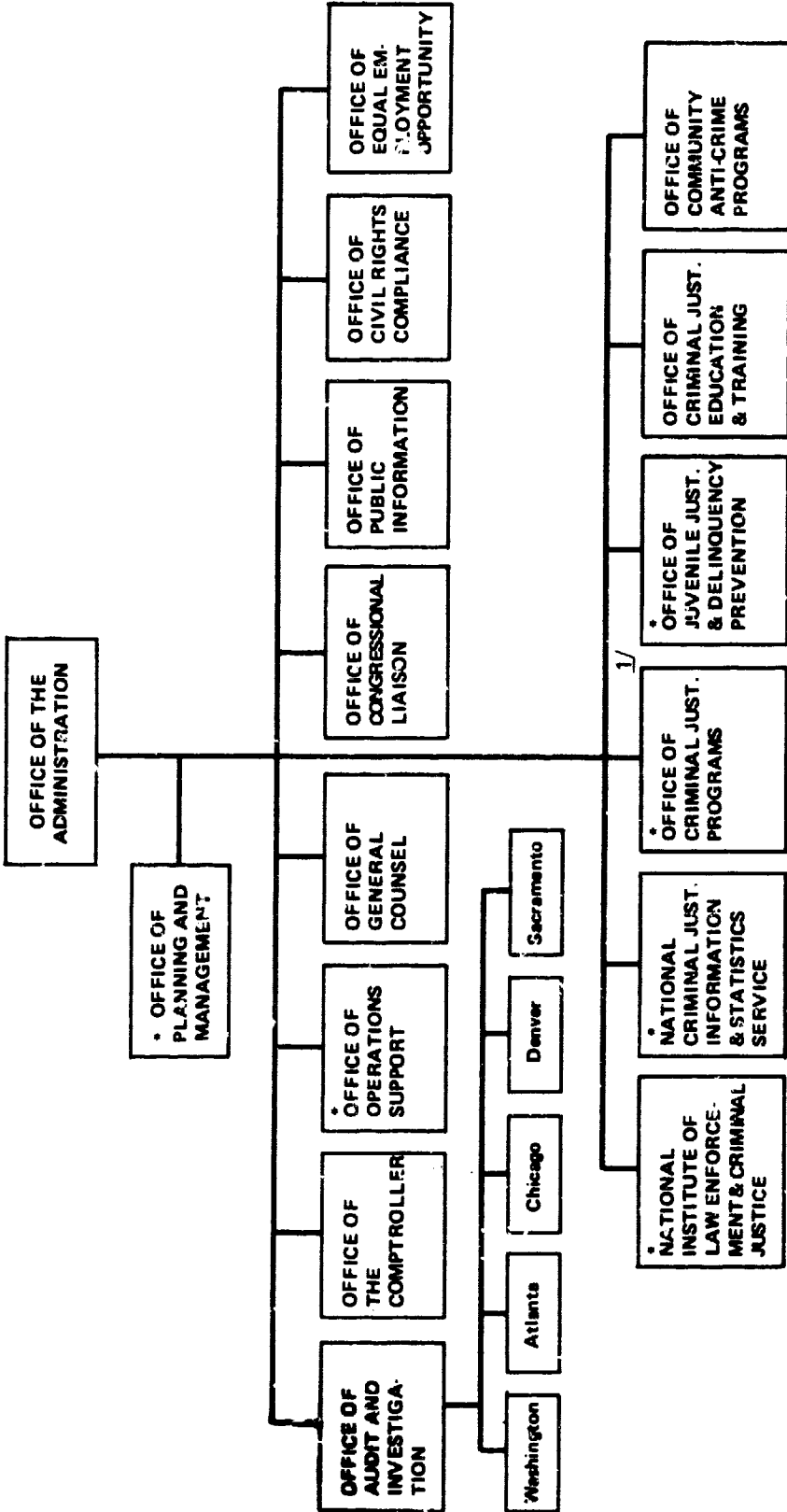
The Crime Control Act of 1973 directed the National Institute, where possible, to evaluate various programs and projects " \* \* \* to determine their impact upon the quality of law enforcement and criminal justice \* \* \*." In response to this mandate, the National Institute expanded its evaluation efforts.

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1/LEAA's Pilot Cities Program began in 1970 as a \$30 million effort designed as a new way to improve criminal justice systems through direct financing involving eight different locations. LEAA selected each location to research, demonstrate, and integrate new and improved projects into each locale's criminal justice system to prevent or reduce crime and delinquency.

LEAA's High Impact Anti-Crime Program was a \$160 million effort initiated in fiscal year 1972 designed to reduce the incidence of stranger-to-stranger crime (murder, rape, assault, robbery, and burglary) in eight metropolitan cities by 5 percent within 2 years and by 20 percent within 5 years from program implementation.

# LEAA ORGANIZATION CHART



1/ At the time of our review there were 10 regional offices which also had evaluation responsibilities.

\*LEAA organizational units having evaluation responsibilities at the time of our review.



Four National Institute offices are substantively involved in evaluation efforts--the Office of Research and Evaluation Methods, the Office of Program Evaluation, the Office of Research Programs, and the Office of Development, Testing, and Dissemination. In addition, an evaluation clearing house has been designated within the National Criminal Justice Reference Service of the National Institute.

At the time of our review, the National Institute was primarily responsible for the Knowledge Program and certain aspects of the Development Program.

### National Evaluation Program

The National Evaluation Program (NEP) is the cornerstone of LEAA's Knowledge Program and is designed to use the intergovernmental action grant program as a basis for meeting the congressional mandate to determine what has been learned about reducing crime through the LEAA program. NEP's purpose is to produce and disseminate information about the level of effectiveness, cost, and problems of various law enforcement and criminal justice programs.

Begun in fiscal year 1975, NEP was designed to consist of a series of two-phased evaluation studies of various criminal justice programs and projects, including those supported through block grants. Each study is to concentrate on a specific topic area consisting of similar ongoing projects. In a "Phase I" study, existing information on and results of prior studies related to the topic area are collected and assessed and a design is developed for further indepth evaluation necessary to fill significant gaps in present knowledge. Each Phase I assessment, expected to last between 6 to 8 months, is to result in

- a state-of-the-art review,
- descriptive material documenting the typical internal operations of projects in that topic area,
- an analysis of available information drawing conclusions about the efficiency and effectiveness of projects in the topic area,
- a design for an indepth (Phase II) evaluation of projects in the topic area to fill gaps in existing knowledge, and
- an evaluation design for typical projects in the topic area.

Where appropriate, the design for an indepth evaluation will be implemented as an intensive Phase II evaluation.

As of October 1977, 27 grants for Phase I studies had been awarded representing over \$2.8 million. Twenty-six Phase I assessments had been completed; the results of 19 are available through the LEAA National Criminal Justice Reference Service's Document Loan Program. No Phase II evaluation studies had been completed as of October 1977.

### Model Evaluation Program

The Office of Evaluation of the National Institute has been responsible for helping the States improve their evaluation efforts through the Model Evaluation Program. This \$2 million competitive program was designed to stimulate the development of model evaluation systems in SPAs and sub-state RPU's to demonstrate different approaches to evaluation and to share the experience with other groups of States and RPU's. Eleven of 12 proposals were selected, and grants were awarded by LEAA under this program to 6 SPAs and 5 RPU's. In addition, a \$336,000 grant was awarded to a contractor, a portion of which has been allocated to help LEAA implement this program and to evaluate its success. 1/

### Program evaluation

The National Institute has also been responsible for providing for the evaluation of major LEAA programs. Two such evaluations completed at the time of our review were the evaluation of the Pilot Cities Demonstration Program and the national evaluation of the High Impact Anti-Crime Program. Incessant evaluations of other National Institute demonstration programs (such as Family Crisis Intervention, Community-Based Corrections, and Neighborhood Team Policing) have also been implemented.

### Exemplary Projects Program

The Exemplary Projects Program was designed to identify "outstanding" criminal justice programs, verify their achievements, and publicize them widely with the goal of encouraging their adoption by States and localities.

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1/A report by the Urban Institute summarizing the results of the Model Evaluation Program experience provides additional information about this LEAA evaluation initiative.

Screening procedures were established to identify programs which warrant adoption on a broad scale. To be eligible for consideration as "exemplary," projects must

- be operational for at least a year,
- have significantly reduced crime or measurably improved the operations and quality of the criminal justice system,
- be cost effective, and
- be adaptable to other jurisdictions.

As of September 1977, 25 projects had been designated as exemplary by LEAA. At least three of these projects were not funded with LEAA money, and five received partial support with LEAA funds.

To test their nationwide applicability, LEAA has funded replications of selected exemplary projects to evaluate their results in conjunction with the Demonstration Project Program. Of the four topics chosen for replication, at the time of our review, only one was solely based on an LEAA-designed exemplary project--the Des Moines, Iowa, Community-Based Corrections Project.

#### Compendium of Selected Criminal Justice Projects

In June 1975 LEAA published a "Compendium of Selected Criminal Justice Projects," based on the results of a national survey. It describes over 650 projects presented in 4 classes: (1) exemplary projects, (2) prescriptive packages, (3) promising projects, and (4) State and local support projects. As part of this effort, LEAA, at the time of our review, intended to develop a system for the routine identification, validation, evaluation, and eventual transfer of particularly promising criminal justice operations.

#### Planning for evaluation in juvenile justice

Evaluation in the Office of Juvenile Justice and Delinquency Prevention involves several efforts, including the establishment of an evaluation planning group. This group is composed of staff from the Juvenile Justice Institute and a group of outside experts who are involved in the planning of program initiatives under the Juvenile Justice and Delinquency Prevention Act.

The role of the evaluation planning group is to:

- Assess knowledge relevant to the program area topic and to report on this in a background paper.
- Participate in developing strategies.
- Help develop guidelines that are part of the program announcement.
- Review concept papers and preapplications to assess whether their design will facilitate a good evaluation.
- Visit potential grantees to determine whether data is available and whether the program contemplated can be evaluated.
- Finish developing the evaluation strategy and the research design during the period that the final action grant applications are being developed and processed.

OJJDP's Status Offender Program has been the focus of the first of these efforts. A grantee has been selected to perform similar evaluation planning tasks for the Diversion Program. Evaluation planning grantees for two additional priority program areas had not yet been chosen at the time of our review.

The evaluation of the projects funded in OJJDP program areas are to be conducted by two different evaluators. One grantee is to coordinate the evaluations of all projects funded under a program area and to develop a comprehensive report. Separate awards will be made to conduct the onsite portion of the evaluations of separate action projects funded under an LEAA juvenile justice program initiative.

Section 243 of the Juvenile Justice and Delinquency Prevention Act authorizes the Juvenile Justice Institute to sponsor basic research and program evaluations on any aspect of delinquency.

A major part of the Juvenile Justice Institute's basic research program is intended to support the development of the major LEAA/OJJDP program initiatives,

which include the NEP studies and other knowledge assessments. 1/

Other evaluation-related activities of the Juvenile Justice Institute planned for at the time of our review included an examination of:

- Delinquency in American Society--a project to increase knowledge of the nature and distribution of juvenile delinquency.
- Police Juvenile Diversion Program.
- Courts' processing of juveniles.
- Juvenile corrections.
- Long-range planning to (1) analyze social and demographic trends and (2) develop projections of impact on trends of juvenile delinquency.
- Factors of causation, development, and maintenance of delinquent and criminal careers over time.
- System flow study of youth through the juvenile justice system.
- Effects of alternatives to incarceration.
- Youth service centers.

#### Evaluation research

To promote the development of new techniques, measures, and methods for use in evaluating criminal justice programs, the National Institute had begun to:

- Examine the feasibility of establishing a computer-based data archive for criminal justice research and evaluation.
- Investigate the use of modeling techniques to predict changes in crime statistics.

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1/The evaluation program activities and initiatives of OJJDP and its Juvenile Justice Institute were just beginning at the time of our review. Consequently, we were not able to assess their effectiveness or results as part of our overall review in LEAA and the States.

--Evaluate the state of the art in criminal justice system modeling and to assess its utility for local planning and decisionmaking.

### Training and technical assistance in evaluation

Technical assistance was offered through LEAA's 10 regional offices in 2 ways: (1) upon request, the planner-evaluator in each regional office provided assistance to SPAs, RPU's, and local governments in evaluation design and techniques and (2) several days of technical assistance were to be provided through a contractor (the Urban Institute) to SPAs. 1/

Two kinds of evaluation training were under development. The National Institute's Office of Evaluation was developing a program to train evaluators to measure the effectiveness of corrections programs. The Training Division of the Office of Operations Support was developing, in cooperation with other offices in LEAA, a 1-week course to teach monitoring and evaluation skills to State and local monitors and evaluators. This course was scheduled to be ready for trainees before 1977.

### Other evaluation activities

LEAA also has increased its commitment to evaluate discretionary grant projects. Funds are made available to grantees to (1) develop a performance measurement plan which is acceptable to LEAA and (2) evaluate programs or projects.

LEAA's Office of Planning and Management, responsible for evaluation oversight and policy development, issues the evaluation guidelines for discretionary and SPA grants. Evaluation requirements in the Office of National Priority Programs (now part of the Office of Criminal Justice Programs) specified additional evaluation procedures that were required of grantees participating in programs administered by the Office.

The National Criminal Justice Information and Statistics Service has initiated two evaluation-related studies: a cost-benefit study of LEAA's Comprehensive Data System Program and

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1/These regional offices were closed on Sept. 30, 1977.

a review and assessment of telecommunications planning in 50 SPAs. In addition, the National Academy of Sciences has examined LEAA's National Crime Panel effort (victimization survey). The victimization survey examines the rates at which persons age 12 or older, households, and businesses across the Nation are victimized by crime, by interviewing a representative national sample of up to 65,000 households and 15,000 commercial firms.

Finally, LEAA conducted an assessment of criminal justice programs it has sponsored over the past 6 years.

### Evaluation in LEAA regional offices

Many of LEAA's responsibilities were decentralized and administered through 10 regional offices. Regional administrators were responsible for approving, awarding, monitoring, terminating, and evaluating discretionary grants within their regions, subject to headquarters' policy direction and guidelines issued by the LEAA Administrator. Each regional office typically had three divisions: Operations, Program Development and Technical Assistance, and Financial Management. Regional office planning and evaluation staff were involved in the development of operational policies and procedures for planning and evaluating LEAA programs.

For example, the Seattle Regional Office's evaluation responsibilities included:

- Assuring that each State's planning grant application and comprehensive State plans were consistent with LEAA's evaluation guidelines.
- Helping each State develop an adequate evaluation capability.
- Reviewing and assisting in the development of evaluation components/designs for discretionary grants.
- Monitoring the implementation of evaluations of discretionary grants.
- Reviewing completed evaluation reports and giving the National Institute copies of evaluations and other reports as required.
- Disseminating to the States evaluation information received by LEAA headquarters.

Regional office personnel did not perform evaluations; they relied on States, project personnel, and contractors to do them. The regional office planner-evaluator was primarily responsible for the above evaluation-related activities.

### Evaluation policy developments

A review of LEAA evaluation policy and progress of past and on-going evaluation activities was authorized by the Administrator 18 months after issuance of the March 1, 1974, Evaluation Policy Task Force report.

A conference was held on September 10 and 11, 1975, to discuss the evaluation policy and LEAA office roles and responsibilities, as follows:

- Management of the LEAA evaluation program.
- Use of evaluation findings in LEAA decisionmaking.
- Evaluation methodology.
- The development of an SPA Monitoring/Evaluation Capacity Building Strategy for fiscal years 1976 and 1977.

Following the conference, an Evaluation Policy Working Group was set up to explore and recommend actions for resolving issues raised at the conference. The composition of the group was limited by the Deputy Administrator for Administration only to those LEAA offices with a major role in implementing the LEAA evaluation program and representation from one LEAA regional office.

A formal statement of LEAA evaluation policy was issued in the form of an instruction to all LEAA professional personnel on May 20, 1976. The recommendations of the Evaluation Policy Working Group, which were subsequently approved by the Administrator in this instruction, collectively represent a five-point strategy:

- Issuing a policy statement in the form of a directive to clarify LEAA office roles and responsibilities regarding evaluation and to hold offices accountable for performance.



- Monitoring LEAA's implementation of evaluation policy directives by the LEAA Office of Planning and Management.
- Developing capability to manage evaluation responsibilities, analyze evaluation results, and work with evaluators in program and evaluation design activities within each major office having program responsibilities.
- Systematically evaluating the discretionary program through involvement of National Institute staff in designing selected programs to insure that they are evaluable.
- Improving SPA and RPU evaluation capabilities through evaluation training and technical assistance to be offered by or through LEAA.

Specific recommendations and related major evaluation program initiatives will be discussed in relation to our findings more fully in succeeding chapters. 1/

#### EVALUATION RESPONSIBILITIES OF THE STATES

The 1973 and 1976 acts assigned specific evaluation responsibilities to the States. In both acts the Congress provided for the States to perform evaluation activities under both part B (planning) and part C (action) grant funds. The Congress intended that grants funded under part C be evaluated by including the term "evaluation" in both sections 301(b), 302(a) and (b), and in section 303(a) of the Crime Control Act.

Section 301(b)(1) provides:

- "(b) The Administration is authorized to make grants to States having comprehensive State plans approved by it under this part, for:
  - (1) Public protection including the development, demonstration, evaluation, implementation, and purchase of methods, devices, facilities, and equipment designed to improve and strengthen law enforcement and reduce crime in public and private places." (Underscoring supplied.)

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1/With the exception of evaluation in OJJDP, for the reasons noted on p. 19.

Section 303(a)(12) of both the 1973 and 1976 acts requires States to provide for such fund accounting, audit, monitoring, and evaluation procedures as may be necessary to assure fiscal control, proper management, and disbursement of funds received.

Section 303(a)(17) of the 1976 act spells out the full impact of the intent of the Congress regarding the provision for cogent evaluation requiring the States to

"\* \* \* provide for the development and, to the maximum extent feasible, implementation of procedures for the evaluation of programs and projects in terms of their success in achieving the ends for which they were intended, their conformity with the purposes and goals of the State plan, and their effectiveness in reducing crime and strengthening law enforcement and criminal justice \* \* \*."

In his written response to concerns raised by certain States, LEAA's General Counsel recognized much earlier the applicability of congressional intent with respect to the use of part C (action) funds for evaluation purposes.

LEAA's "Guideline Manual for State Planning Agency Grants" specifies evaluation requirements with which the States are expected to comply and which they must address in applying for State planning grants and block action grants. At the time of our review, the guidelines principally required that each SPA:

- Allocate sufficient resources to adequately carry out its evaluation and monitoring responsibilities. Each SPA must describe how the evaluation and monitoring functions are organized within the SPA.
- Insure that the subgrant application and subgrant process provide the prerequisites for (1) an "internal assessment," or an analysis of the results and impact of each project, to be performed by the subgrantee and (2) more intensive monitoring and evaluation activities.
- Specify the criteria for selecting projects to be intensively evaluated, state how these evaluations are planned and implemented, indicate the resources allocated to such efforts, and

identify the projects or programs to be intensively evaluated according to the SPA's planning needs. 1/

--Describe the relationship between intensive evaluation and planning, including:

1. Procedures for reporting, corroborating, and using evaluation findings in the planning and funding decisions of both the SPA staff and the SPA's supervisory board.
2. Measures taken to insure independence of the evaluators from the projects, objectivity and accuracy of the evaluation, and timely submission of evaluation reports.

--Detail, in each program area in its State comprehensive plan, the sources of evaluation data which the SPA has consulted in developing the projects and programs proposed.

---Describe the ways in which the evaluation data, where such data exist, influence the projects and programs in the State comprehensive plan.

--Indicate how evaluation results and findings are disseminated to relevant local agencies.

Furthermore, in setting forth its evaluation strategy and organization of evaluation activities, each SPA must identify (1) its chief evaluation needs (e.g., training, qualified evaluation specialists, funding, and authority), (2) its plans for meeting them, and (3) evaluation assistance to be offered to local criminal justice agencies (e.g., training, research and evaluation units, technical assistance, etc.).

The SPA may, but need not, delegate some or all of the evaluation responsibilities in these guidelines to RPU's within the State. However, the SPA is ultimately responsible for seeing that these responsibilities are carried out.

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1/Intensive evaluations are to incorporate sound evaluation methodologies (e.g., experimental designs developed prior to project implementation, control groups, independent data collection and analysis, and indepth case studies).

## LEAA-NEP requirements the States must meet

Each State must (1) consider NEP results and the results of its own evaluations in planning its future activities and (2) see that such evaluation results are considered in its program decisions. If completed NEP studies do not apply to a particular SPA's circumstances, are contradicted by local evaluation, or cannot be implemented for specific local reasons, an SPA need not follow them. However, each State is expected to specify why it disregarded them.

States must (1) identify candidate projects and programs for evaluation in NEP, (2) cooperate in developing and implementing the NEP evaluation design, (3) serve as liaison between LEAA's National Institute, its contracted NEP evaluator, and the subgrantee, (4) provide requested data for NEP, and (5) monitor the project and the evaluation.

## NOT ALL STATES ARE COMPLYING WITH FEDERAL EVALUATION GUIDELINE REQUIREMENTS

During the 3-year period covered by our review (1973-75), the evaluation efforts, activities, and operations of four SPAs we visited varied significantly in level of effort and organization.

Three of the four SPAs visited did not have fully established evaluation programs and in our opinion were not meeting LEAA guideline requirements for maintaining an adequate evaluation capability. In the fourth SPA (Pennsylvania), which technically was complying, State evaluation efforts were highly decentralized. Eight separate RPUs were deciding what to evaluate, how often, and what level of evaluation was appropriate.

### Oregon

The Oregon SPA has two evaluation units; one resulted from the LEAA Impact Cities Program to service the city of Portland, and another was responsible for evaluating SPA-funded block subgrant projects. The Impact evaluation unit was primarily supported by LEAA discretionary funding and consisted of six people at the time of our review. The block grant evaluation unit was supported with part B funds and was staffed by only one person. Information about the SPA's evaluation program in its 1976 planning grant application was limited to an organization chart, a grant application form, and a brief task and objective statement for key SPA personnel.

The SPA has specified three levels of evaluation: "intensive, assessment, and monitoring." The goal of the SPA was to evaluate a minimum of 17 percent of all subgrants during the first year; the remainder of the subgrants were to receive either assessment or monitoring.

Evaluation activities of the SPA at the time of our review consisted of (1) reviewing and helping subgrantees develop evaluation components/designs for block subgrants, (2) managing the Portland Impact Cities evaluation, (3) monitoring the implementation of evaluations for block subgrants and Impact (discretionary) grant projects, and (4) reviewing completed evaluation reports and disseminating copies to the LEAA regional office and others. In the past, SPA personnel, project staff (of the subgrants), and third-party contractors had been used to implement the evaluations. According to SPA staff, third-party contractors' evaluations had been inadequate and costly. At the time of our review, the SPA had discontinued allocating block subgrant funds for evaluations by third-party contractors.

SPA officials admitted that Oregon's evaluation program was not complying with the intent of LEAA guideline requirements. The SPA director stated that not enough resources had been allocated to be able to comply. However, the LEAA regional office official primarily responsible for reviewing Oregon's planning grant applications stated that at the time of his review, he believed Oregon's submission complied with LEAA guidelines. An SPA staff member told us that when the LEAA regional office had been informed that Oregon just could not comply with many of the LEAA guidelines, an LEAA official had replied that the guidelines were not viewed as requirements but as goals that SPAs should work toward.

The SPA was seeking additional funding to strengthen its in-house evaluation capability.

Our review of Oregon's evaluation efforts and activities, the results of which are presented more fully in chapters which follow, shows that Oregon's block subgrant evaluation efforts have not complied with the intent of Federal evaluation guidelines.

### Kansas

Evaluation functions and responsibilities are assigned to the SPA's Research and Evaluation Division, which was staffed by four research analysts at the time we were

completing our field work. The division's responsibilities included (1) collecting, analyzing, and preparing data for the development and revision of the statewide comprehensive plan and (2) helping SPA deputy directors develop evaluation designs for subgrants. Also the chief of the division was responsible for the preparation of the State comprehensive plan and the statewide standards and goals program initiative.

The SPA's 1976 evaluation and monitoring policy involved four categories of efforts: (1) "monitoring," (2) "self-assessment" by the subgrantee, (3) "SPA assessment," and (4) "recommendations for intensive evaluation." The SPA assessment is the formal responsibility of the Research and Evaluation Division. The SPA assessment consists of processing subgrant applications through various reviews (i.e., for completeness, adequacy of project budget, consistency with needs, anticipated results, and other conditions revealed through monitoring reports). Recommendations for or against funding are forwarded to a subcommittee of the SPA supervisory board. Intensive evaluations are no longer even attempted by SPA staff. The fiscal year 1976 policy of the SPA stated that Research and Evaluation Division staff will target specific projects that could be intensively evaluated by LEAA through NEP and/or the full SPA supervisory board.

A preliminary set of the Kansas SPA's evaluation guidelines, specifying what evaluation conditions and information are to be contained in subgrant applications, consisted of five sections: (1) statement of goals and objectives and evaluation timetable, (2) identification of evaluation measures, (3) development of data needs, (4) determination of data analysis methods, and (5) use of a project history log. These guidelines had not been implemented at the time of our review, although a plan to implement them, with technical assistance from the SPA and RPU planners, was to be developed as part of the evaluation component to the SPA's 1976 State plan.

LEAA's evaluation guidelines for fiscal years 1973 and 1974 State plans provided three options from which the SPA could select to meet its evaluation requirements: (1) evaluate 15 percent of the total number of subgrants, (2) evaluate 15 percent of the dollar value of subgrants from the State comprehensive plan, or (3) evaluate all subgrants awarded from at least one significant program area.

During fiscal years 1972 to 1975, the Kansas SPA chose the second option. An SPA official said this goal had never been

reached due to heavy SPA workloads, unrealistic goals of action projects funded, and a lack of understanding on the part of the SPA as to what LEAA actually requires.

To determine the extent to which the Kansas SPA had met LEAA evaluation guideline requirements during fiscal years 1973-75, we compared the dollar value of the projects funded from each fiscal year plan (1973-75) with the dollar value of those projects which were evaluated.

Only one project, in the amount of \$108,101, was evaluated from the 1973 State plan. It represented 1.9 percent of the total dollar value of subgrants awarded that fiscal year. The 1974 plan projects evaluated to completion represented \$48,104, or eight-tenths of 1 percent of the moneys awarded by the SPA in that fiscal year. None of the projects awarded from the 1975 State plan had been or were being evaluated at the time of our review. Clearly, Kansas had not met LEAA's requirements for evaluation during 1973, 1974, and 1975. Further, the SPA's evaluation policy statement, as revised for the 1976 plan, indicates that the SPA had no intention of meeting LEAA's requirements for intensive evaluation in 1976.

SPA staff will recommend projects to the SPA supervisory board and LEAA which they believe should be subjected to intensive evaluation; the evaluation is to be performed by LEAA or, only upon request by the SPA supervisory board, by a third-party contractor. In spite of these shortcomings, in 1975 an LEAA regional office official stated that (1) the Kansas SPA's revised evaluation component for the 1976 State plan fully complied with LEAA's evaluation guideline requirements and (2) the SPA was to be commended for its work on the evaluation component.

### California

At the time of our review, the SPA was undergoing significant reorganization and, within less than a year, its staff was reduced from over 200 to 36 people, eliminating the professional positions of what had previously been a 5-person evaluation staff. The Operations Division, one of two divisions of the SPA, is responsible for the State evaluation program. However, at the time of our fieldwork, an evaluation program had not been established and program and project evaluations had not been initiated by the SPA since January 1975. At the time of our review, no evaluation requirements had been established, no State evaluation staff had been formed, and no management system for conducting and using evaluation results had been established by the current California SPA administration.

Before the reorganization, which began in January 1975, the SPA had been implementing a \$3.8 million comprehensive statewide evaluation program (i.e., this amount represents its second year of funding), which consisted of six major elements:

- Technical assistance in evaluation planning, design, and implementation support.
- Competency-based training in evaluation.
- Development of reliable crime measures and standardized data bases.
- An evaluation information system--in the planning stage.
- An evaluation resource and reference service to synthesize and disseminate evaluation information and findings.
- Program-level evaluations of groups of projects which share outcome objectives in common.

This statewide effort, we were told, was about 80 percent operational before the 1975 reorganization.

The SPA director said he was considering the establishment of a statewide evaluation advisory committee to the California Council on Criminal Justice (i.e., the SPA's supervisory board), which would consist of Federal (LEAA), State, and RPU personnel. The SPA's concept of evaluation is that the responsibility for evaluation is to be with the RPUs and local governments, rather than at the State level. However, LEAA's guideline requirements state:

"The SPA may, but need not, delegate some or all of the evaluation responsibilities set forth in these guidelines (for evaluation) to regional planning units within the State. However, the SPA will remain ultimately responsible for seeing that these responsibilities are carried out." (Underscoring supplied.)

To determine the extent of RPUs' involvement in evaluation, we contacted 13 of the 21 RPUs. We were informed that RPU involvement and participation in evaluation varies significantly from complete involvement to minimum involvement. Two RPUs stated that they had no involvement, five indicated their evaluation efforts are implemented on a limited basis, and the remaining six indicated their involvement varies.



Two of the six RPUs require independent evaluations on all projects, two perform the evaluations, one has formed a five-county evaluation committee to evaluate project compliance, and the sixth helps subgrantees to be able to meet subgrant conditions regarding evaluation.

In 1975 a committee composed of two RPU personnel, three staff members from the California Youth Authority, and one staff member from the California Department of Corrections submitted an evaluation strategy paper to the SPA director, but no State procedures were implemented. SPA officials estimated that a State evaluation program would be operational within the first 6 months of calendar year 1976.

The responsible LEAA regional office official stated that (1) the SPA was not adequately meeting LEAA evaluation requirements for meeting management and development goals and (2) consideration was being given to placing "special conditions" on grant awards to the California SPA after negotiations with the State.

Because the California SPA had no established evaluation program and had not allocated resources for maintaining an evaluation capability, we concur with LEAA officials that California was not complying with Federal evaluation requirements.

### Pennsylvania

The SPA's Evaluation and Monitoring Unit is part of the Program Support Division of the Governor's Justice Commission, Pennsylvania Department of Justice. It was staffed by three professionals and one secretary. The SPA's Statement of Evaluation Policy, adopted by the supervisory board in February 1973, gave the unit responsibility for evaluation activities supported by the SPA. The unit is responsible for managing and coordinating the evaluation effort statewide. Although the unit is permitted to conduct evaluations, it does not ordinarily do so.

Project evaluation and monitoring responsibilities are delegated to the State's eight RPUs. The SPA Evaluation and Monitoring Unit is responsible for arranging and managing the assessment of those State and Federal discretionary projects which involve more than one RPU. The SPA's evaluation and monitoring guidelines indicate that the SPA evaluation unit will not manage the independent evaluations of projects at the RPU level. Consequently, each RPU is responsible for designating an individual as an evaluation and monitoring

coordinator for the RPU. The SPA's evaluation and monitoring guidelines suggest that if personnel and expertise are available, the RPUs may establish their own in-house evaluation capability to carry out evaluations in accordance with the SPA's formal procedures for "independent evaluations."

To ascertain how the SPA's evaluation and monitoring guidelines are applied, we visited two RPUs. RPU (A), which is responsible for a populous urban county and which receives a substantial portion of the subgrants awarded by the SPA, reported that it uses independent evaluators to evaluate all projects receiving over \$10,000 in Federal funds. Exceptions involve ongoing projects which "have proven their merit" and minor equipment projects representing costs of less than \$20,000 to \$30,000. At the time of our review, the RPU evaluation unit chief reported that he managed from 85 to 100 independent evaluations at a time.

RPU (B) represents four suburban counties surrounding a large metropolitan city and receives a smaller portion of the funds available. This RPU selected only projects costing over \$75,000 to be evaluated independently. Other projects were reported to be assessed by RPU staff "as much as possible."

Both RPUs received similar evaluation assistance from the SPA in the form of SPA evaluation and monitoring guidelines, telephone contacts, and visits from the chief of the SPA Evaluation and Monitoring Unit.

The Pennsylvania SPA received a \$261,162 grant from LEAA's National Institute under the Model Evaluation Program. This 2-year funded effort in Pennsylvania emphasized developing strategies for specific program, project, and systemwide evaluation. The first year had been devoted to developing a program evaluation section within the SPA Evaluation and Monitoring Unit. When fully staffed, this section was expected to consist of a chief, two program evaluation specialists, a research assistant, and a secretary.

According to the cognizant LEAA regional office, Pennsylvania's application for 1976 part B planning funds adequately met the LEAA guideline application requirement's provisions for evaluation. The regional office planner-evaluator believed that the SPA's 1975 State plan also met LEAA guideline requirements concerning evaluation functions and activities. Although Pennsylvania's 1976 State Comprehensive Plan was incomplete at the time of our review, our analysis of the previous year's plan and the SPA's 1976 planning grant application indicated that the evaluation component as presented and described essentially complied with LEAA evaluation guideline requirements.

## Evaluation in SPAs nationwide

The results of a 1975 survey of SPAs conducted by the Advisory Commission on Intergovernmental Relations (ACIR) indicated that 45 of 50 SPAs responding felt that they had developed some State evaluation strategy which outlined a program for evaluating the results and impact of SPA-supported activities. Yet only about 50 percent of those SPAs stating that they had such a strategy indicated that staff and other resources were adequate to carry out evaluation responsibilities outlined in their strategies.

### CHAPTER 3

#### AMOUNT AND TYPES OF EVALUATION

##### WORK HAVE NOT BEEN ADEQUATE

In a questionnaire circulated to 37 organizational units (offices, divisions, and sections) within LEAA headquarters, we asked how many evaluations were being or had been conducted involving fiscal year 1975 programs and projects. For 20 units responding that they were involved in evaluation or evaluation-related activities, we determined that at least 514 evaluations were being or had been implemented for fiscal year 1975 program activities. As of June 30, 1976, 872 grants, contracts, and agreements representing \$217.8 million in fiscal year 1975 nonblock grant moneys, had been funded.

However, records of 205 LEAA discretionary grants awarded by LEAA's region VII in the 4-State region since fiscal year 1972, revealed that 48 were active but none had been evaluated.

In commenting on evaluation activities in LEAA, some headquarters personnel indicated difficulty in being able to monitor agreements and expand their evaluation program activities to an acceptable level. They cited understaffing as a problem which has had a detrimental affect on doing extensive evaluations or validating evaluation results. They also mentioned that they had been experiencing a lack of coordination between the primary evaluation unit and other LEAA units responsible for the programs and projects being evaluated.

#### OREGON

During fiscal years 1973-75, Oregon evaluated an average of 11 percent of its block subgrant projects. SPA records indicated that the proportion of projects which had been or were being evaluated had not increased appreciably since fiscal year 1973.

<u>Funding year</u>	<u>Number of subgrants awarded</u>	<u>Number of subgrants evaluated</u>	<u>Percent of subgrants evaluated</u>
1973	124	12	9.7
1974	114	13	11.4
1975	<u>88</u>	<u>11</u>	12.5
Total	<u>326</u>	<u>36</u>	11.0

SPA staff we contacted criticized past evaluation efforts. The SPA director stated that the SPA has not performed enough evaluation of its funded block subgrants to be able to have significantly affected the planning process or Oregon's State comprehensive plan. His estimate, that only about 10 percent of the block grant projects are evaluated sometime during the life of the projects, was consistent with our findings.

Several Oregon State officials expressed concern over the inadequate amount of evaluation work. Their concern was that:

- There is limited program coverage.
- The SPA does not have sufficient staff to conduct the number of evaluations needed.
- More money should be provided for evaluation of projects so that better use can be made of available resources by eliminating projects that do not produce.

In November 1975 the Oregon SPA described this situation in its application to LEAA for additional funding for evaluation.

"Since 1969, approximately \$50,000,000 in LEAA fund awards have been invested in Oregon's criminal justice system. Though this investment has undoubtedly had a significant and beneficial impact upon the system, little hard evidence exists to prove it. During the past two years, a fairly intensive monitoring effort measured and recorded operational efficiency of most funded OLEC [SPA] projects, but little was done to document final outputs or effectiveness of these projects. Consequently, decisions relating to project refunding, adjustment of program criteria, and overall planning were largely made without benefit of reliably based, logically collected, results-oriented data concerning project \* \* \* capabilities."

## PENNSYLVANIA

The Acting Executive Director of the SPA, at our request, estimated the number of projects evaluated since fiscal year 1973. He estimated that Pennsylvania had evaluated 298 of 2,036 (14.6 percent) of the projects funded during fiscal years 1973-75.

<u>Fiscal year</u>	<u>Number of projects awarded</u>	<u>Number of projects evaluated</u>	<u>Percent of projects evaluated</u>
1973	764	104	13.6
1974	785	113	14.4
1975	<u>487</u>	<u>81</u>	16.6
Total	<u>2,036</u>	<u>298</u>	14.6

We were also told that, between 1969 and the time of our review, the SPA had received 344 reports from evaluations completed. However, we could find only 127 reports of completed evaluations on file with the SPA's Evaluation and Monitoring unit. The director of the unit could not guarantee that the file was complete because the SPA relies on its RPUs to (1) give it information on which projects will be evaluated and how the evaluations will be conducted and (2) forward copies of evaluation reports. In several cases, projects had been evaluated without the SPA's knowledge and copies of evaluation reports had to be requested from RPU directors.

#### KANSAS

In Kansas, only 11 (1.4 percent) of 792 projects funded during fiscal years 1973-75 had been subjected to evaluation. Six of the 11 were evaluated by third-party contractors. For the five remaining projects, which SPA staff were to have evaluated, only one evaluation was followed through to completion and issuance of a report. Three evaluation reports were on hand at the SPA, one covering five projects and two reports evaluating one project each.

At the time of our review, Kansas had allocated and spent less than six-tenths of 1 percent of its fiscal year 1973-75 funds, for evaluating and monitoring 792 projects.

#### CALIFORNIA

Although the statewide evaluation program was terminated in 1975, we determined, by randomly sampling 5 percent of the available project records, that of 667 projects funded in fiscal years 1973-75, about 45.5 percent may have been evaluated in some fashion. According to SPA personnel, after the reorganization many of the records pertaining to completed

evaluations had been discarded or could not be located. Personnel in RPUs where the projects in the sample had been implemented said copies of some evaluation reports were available, but only at the RPU level.

#### OTHER STATES

In 1975 the Advisory Commission on Intergovernmental Relations (ACIR) made a national survey of SPAs as one part of LEAA's Six-Year Assessment of the Crime Control Act Program. Fifty-two responding SPAs reported that they evaluate an average of 28 percent of their funded projects each year, representing, on the average, 33.7 percent of their block grant funds.

About one-half of the responding SPAs believed they had achieved the "Minimum Standards for Evaluation" adopted by the National Conference of State Criminal Justice Planning Administrators. These standards hold that (1) each SPA shall annually develop a specific evaluation strategy which insures that a representative sample of all programs are evaluated and (2) each SPA will evaluate or insure the evaluation of 25 percent of the total number or dollar value of subgrants for each fiscal year or the evaluation of all subgrants from at least one significant program area. Further, in selecting projects to be evaluated, the SPA should give primary consideration to program areas which will have maximum impact on reduction of crime or improving the criminal justice system. When possible, such evaluations shall include assessing the impact of projects or programs upon other components of the criminal justice system.

Twenty-seven percent of 52 responding SPAs indicated that their evaluation efforts had increased only moderately, 19.2 percent had experienced only a slight increase, and an additional 3.8 percent reported no change in their evaluation activities since 1970. Of 51 SPAs responding, only 29 (56.9 percent) reported having great influence over evaluation of LEAA/SPA-funded projects involving grants awarded to State agencies.

Twenty-nine percent of 49 SPAs responding reported that their monitoring activities were not sufficient to generate adequate information for SPA management, planning, and funding decisions.

#### RPUs AND LOCAL GOVERNMENTS

Of 350 RPUs responding to the ACIR survey, 213 indicated they evaluated an average of 57.3 percent of their projects

each year. Two hundred and nine RPU's reported they evaluate, on the average, 48.4 percent of the dollar value of federally funded efforts in their regions.

Questionnaires were also sent to 2,301 municipalities and 2,244 counties with civilian populations over 10,000, as part of the survey. Of those responding to a question asking whether they perform project evaluations related to the Safe Streets Act program, 66.6 percent of 1,185 municipalities and counties reported they perform project evaluation tasks. However, 54.4 percent of 996 municipalities and counties responding rated "Safe Streets, part B, planning funds" as inadequate to carry out their criminal justice planning responsibilities, which include evaluation. Thirty-one percent stated that they did not know whether the SPAs in their States monitor or evaluate projects and programs funded within their locales. An additional 17.5 percent of the municipalities and counties reported that the SPAs did not do so.

However, respondents may not be able to differentiate between formal evaluation and the less intensive monitoring of project expenditures and activities. Consequently, their interpretations of what constitutes evaluation may vary. Thus, the amount of reported evaluation activity may be overstated.

#### FEW OUTCOME EVALUATIONS ARE BEING DONE

In a previous report <sup>1/</sup> we stressed the need for more and better outcome evaluations. Outcome evaluations are defined and described on pages 4 and 5.

In Oregon only 2 of the sample of 12 evaluation reports we obtained were outcome evaluations. In California 2 of 33 randomly selected evaluations examined were outcome evaluations. Of the three completed evaluations we were able to obtain for examination at the Kansas SPA, two adequately presented statements of findings which specified project outcomes. According to SPA officials in Pennsylvania, the majority of the 87 projects funded during fiscal years 1973-75 which had been or were to be evaluated were or would be outcome evaluations. However, our examination of a random sample of 13 completed evaluations from Pennsylvania showed that only 4 had adequately presented an assessment of project outcomes based on an analysis of data and information.

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<sup>1/</sup>"Progress in Determining Approaches Which Work in the Criminal Justice System," B-171019, Oct. 21, 1974.



Thus, of the 61 sample project evaluations examined, only 16 percent adequately presented an assessment of project outcomes.

#### USE OF INTENSIVE EVALUATIONS IS LIMITED

LEAA's 1975 and 1976 guidelines for evaluation required each SPA to intensively evaluate selected projects or groups of projects according to their planning needs. The evaluations were to incorporate sound evaluation methodologies (e.g., experimental designs developed before project implementation, control groups, and independent data collection and analysis). Each State is expected to indicate the projects or programs to be intensively evaluated, the criteria by which they are selected, and resources allocated to such efforts.

Our examination indicated that in three of the four States visited, the generation and use of intensive evaluations (as described by LEAA) is minimal and in Kansas it is nonexistent.

#### Oregon

SPA staff told us that (1) only two fiscal year 1975 projects had been selected for intensive evaluation and (2) no fiscal year 1976 projects would be selected for intensive evaluation until the SPA determined the extent to which its resources could be devoted to such efforts. For two projects which had been subjected to intensive evaluation, we were informed of significant problems regarding their evaluation.

--Project A: The intent had been to design an evaluation to determine the project's impact on reducing recidivism (the defined outcome objective). However, SPA officials concluded that such an evaluation was impossible. Consequently, the evaluation evolved into a "study of people served and services rendered." There was no control group, nor did the methodology employed provide for, or permit, making conclusions about the project's effectiveness.

--Project B: The evaluation was designed to systematically address both the project's outcome and process objectives. However, problems experienced in implementing the evaluation design were considered serious enough to jeopardize the evaluation and limited its potential to adequately address project impact. There were no documented criteria for selecting either target or comparison cases.

Although the SPA staff felt such problems could have been corrected by a "crash" effort, there were not enough personnel to do so.

### Kansas

The SPA experienced significant difficulties in attempting to perform intensive evaluations. As a consequence, the SPA decided that from fiscal year 1976 on

"\* \* \* intensive evaluations will not be performed by the SPA staff. Research and evaluation staff will target specific projects that could be intensively evaluated by contract award to LEAA, the National Evaluation Program, or the Full Committee [of the SPA supervisory board]."

### California

We could not obtain information on intensive evaluations which may have been performed before January 1975, but we were told that such evaluations had been done and a significant amount of expertise had been developed in this area. According to SPA officials, intensive evaluations in the future would be made on a "limited basis." As of March 1976 no evaluations had been initiated by the SPA since June 1975.

### Pennsylvania

Because it had received a \$261,162 grant from LEAA's National Institute under the Model Evaluation Program, Pennsylvania, at the time of our review, was anticipating the development of a three-pronged approach for meeting intensive evaluation requirements.

#### --Intensive project-specific evaluation:

To be carried out by independent evaluators and supported by project funds. The evaluation plans are developed as part of the subgrant application, according to SPA evaluation and monitoring guidelines.

#### --Program evaluation: To provide comparative analysis of the internal efficiency and effectiveness of similar or alternative project strategies for meeting specific criminal justice objectives.

--System evaluation: To provide an assessment of the relative impact and interactive effects of interrelated criminal justice programs and related social services on a set of criminal justice objectives.

The premise on which these efforts were expected to operate was that the success of both "program" and "system" evaluation efforts depends largely on the groundwork laid, and the adequacy of results of "project specific" evaluation efforts.

At the time of our review, no "program" or "system" evaluations had been initiated. The SPA official responsible for these evaluation efforts did not know which or how many local projects (the evaluation of which are managed at the RPU level) had been selected for intensive evaluation.

We could not identify, in Pennsylvania's provision for project specific intensive evaluation, an emphasis on using methodologies which LEAA expects as part of intensive evaluations implemented by the States. LEAA expects

"\* \* \* sound evaluation methodologies including experimental designs developed prior to project implementation, control groups, independent data collection and analysis, and in-depth case studies \* \* \*."

#### ABSENCE OF PROGRAM-LEVEL EVALUATIONS TO ASSESS IMPACT AND RELATIVE EFFECTIVENESS

In a previous report 1/ we also identified certain difficulties associated with attempts to assess the impact and relative effectiveness of various different types of projects. In our recommendations to LEAA, we encouraged the use of program-level evaluations to provide for simultaneous assessment of projects which share common outcome objectives.

The economics of program-level evaluations is illustrated by the following example:

An evaluation team which is evaluating 10 projects joined together as a program can go through one orientation period more efficiently

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1/"Difficulties of Assessing Results of LEAA Projects To Reduce Crime," B-171019, Mar. 19, 1974.

than 10 individual teams which are tackling 10 separate project evaluations. The planning of the evaluation strategy here would occur only once rather than 10 times. The design of data collection instruments and the training of personnel can be greatly simplified.

Where the projects in a program share similar characteristics, it is sometimes possible to collect data from a much smaller number of comparison groups. Occasionally one can achieve further economies through program-level evaluation by appropriately using a single comparison group to service more than one project. When meaningful control group data cannot be collected, program-level evaluation may make the difference between being able to do research-based evaluation and not being able to do it at all. That is, multiple projects in a program area may offer useful contrasts which would normally have required an experimental and a control group to achieve. In this case, it may be possible to show which particular project's intervention strategy is more effective than the others, if comparable outcome data is available from all projects involved.

In addition, program-level evaluations insure maximum cross-project comparability of results. For example, if you have 10 different projects all attempting, in some way, to produce a change in the recidivism rate, often each will define recidivism quite differently from the others. However, by assigning the evaluation of these 10 projects to a single team, one can assure, to the extent possible, that an inclusive definition will be used, increasing the possibility of making cross-project comparisons.

Program-level evaluations also deal with the problem of project uniqueness. Frequently, when a mode of intervention has been demonstrated even through research-based evaluation, to have been successful, one has difficulty determining reasons for the success. Is it because of the intervention strategy, or is it a reflection of some factors unique to the population or the community in which the intervention is being tried? However, where similar project strategies are evaluated concurrently in different communities with different personnel, one can discover (1) whether a program strategy is valid regardless of the uniqueness of each project or (2) whether the effects that do occur appear to be the result of unique characteristics of a single project. Program-level

evaluations help determine which strategies apply to a number of communities and help State and local decisionmakers and policymakers decide whether a particular strategy would be worthy of adoption.

Finally, some of the most important measures of effectiveness, required for most types of evaluations, need to be refined to raise the quality of evaluation products and information to an acceptable level. It is more likely that a highly talented team, working with the greater resources on a program-level evaluation, could effectively answer these methodological questions than could comparatively high-cost individualized project-level evaluations. However, this advantage can be realized only if the planning and design of program-level evaluations is begun before the projects to be evaluated commence operation.

Although we found no instances of ongoing program-level evaluations in the four States, past experience with, and plans for, such efforts varied significantly.

### Pennsylvania

Only Pennsylvania was planning to develop a program-level evaluation strategy. This effort, supported by LEAA funds under the Model Evaluation Program, was in the planning stages in June of 1975. Staff was being recruited to fill positions in a program evaluation section of the Evaluation and Monitoring Unit.

### Oregon

The SPA director emphasized the need to do program-level evaluations but said that none were being done due to the lack of resources. Although there had been some program-level evaluation activity in the past, an SPA staff member said that two attempts had collapsed. We were told this was due primarily to insufficient evaluation personnel at the SPA to coordinate and direct activities and to LEAA's denial of required funding.

### Kansas

We found no evidence of past or planned program-level evaluation activity. In response to an SPA official's statement that such evaluations had been done, we examined an evaluation study which had been implemented to cover five projects (group homes). However, there was no indication that

this effort amounted to more than a clustering of like projects.

## California

Statewide program-level evaluations had been implemented in the area of "diversion and community-based alternatives to incarceration," before June 1975. These evaluations involved program areas with 105 projects, which focused on reducing recidivism by diverting adults and juveniles from the justice system either before or after adjudication and/or conviction. However, at the time of our review State program-level evaluations were no longer being performed.

### INADEQUACY OF PROJECT-BY-PROJECT APPROACHES TO EVALUATION

For the most part, evaluations in the criminal justice field have been almost exclusively project-level evaluations. That is, projects are evaluated independently of each other, on a project-by-project basis. Delays and implementation difficulties give evaluation teams the formidable task of attempting to evaluate some projects which are near the end of their operating periods or which have actually terminated. Thus, the availability of or access to data and information about the projects is restricted and sometimes nonexistent.

Probably the most serious drawback associated with the emphasis on project-level evaluations is the lack of adequate technical talent available to plan and design evaluations before many of the projects are well underway. This lack of technical expertise was found at all levels in this intergovernmental block grant program. The SPAs and RPU's have not previously had qualified personnel to review evaluation components (i.e., the evaluation plan and design) of all the individual project proposals. There have not been enough qualified people available to give subgrantees and local governments the type of assistance necessary to facilitate evaluation planning and design to occur simultaneously with project proposal development. In addition, experienced, competent evaluators (in either the academic or private research sectors) capable of evaluating the types of projects funded by the SPAs or LEAA have been scarce.

Since previous approaches have demanded an expertise which was either not available or not available at the planning stage when it is needed most, it is important to develop alternative strategies which make more efficient use of the limited evaluation expertise that is available, such as program-level evaluation.

Even if project-level evaluations succeeded in providing clear and reliable information on the impact and effectiveness of the individual projects, this information alone would be of limited utility to the SPA Supervisory Boards, SPAs, RPUs, local governments, and criminal justice agencies because of problems of accounting for the unique characteristics of individual projects and/or the differing settings within which they have been implemented.

The vast majority of projects which claim to be measuring a small set of common factors, such as "recidivism," "crime reduction," or other "decreases," in their attempt to show meaningful impact on crime and the criminal justice system performance, have been developed, implemented, and evaluated almost totally independent of one another. Furthermore, because the approaches used to define and measure these common factors are quite different, interproject comparisons are extremely difficult if not impossible. Lack of standardized assessment criteria and outcome measures and noncomparable data bases prevent cross-project comparisons of impact and relative effectiveness.

These three problems: (1) lack of technically able individuals, (2) uniqueness of individual project characteristics or settings, and (3) lack of comparability among evaluations which claim to be measuring the same variables--can best be solved by a shift in emphasis from project-level to program-level evaluation.

Our review of evaluation activities, procedures, and results in Pennsylvania exemplified some of the problems. Most evaluations were only project-level evaluations. Subgrant funds are set aside (estimated by SPA officials as 1 to 2 percent of the projects' budgets on the average) for the project evaluation. These funds are not available either before or after the subgrant award period. This precludes involving the evaluator before the project start date in (1) setting evaluation criteria, (2) operationally defining project objectives which will permit effective, valid, and reliable measurement of results, (3) anticipating and specifying needed preproject baseline data for comparison purposes and (4) participating in other necessary evaluation planning activities. Further, there is often great difficulty in attempting to obtain followup data when the Federal funding period for the project expires. This problem is especially critical in client-centered programs. Here followup of program participants is often required to determine the rate, severity, and length of time to new offense resulting in conviction (recidivism), or other relevant measures of criminal involvement.

The Pennsylvania SPA has taken steps, through a grant from LEAA under the Model Evaluation Program, to implement "program evaluation." It is studying plans for an "information indicator system," which is intended for use in organizing data on similar types of projects for comparative purposes, to eliminate the project-by-project approach to evaluation.

The implications of such problems on the use of evaluation results and on related management issues are specifically addressed in succeeding chapters.



## CHAPTER 4

### QUALITY OF EVALUATION ACTIVITIES AND PRODUCTS IS QUESTIONABLE

We determined, from our review of LEAA and State evaluation activities and procedures and an analysis of a sample of completed evaluation reports, that, generally, the evaluation work performed had significant deficiencies. Furthermore, such deficiencies limit LEAA's National Evaluation Program. Evaluations generally were not planned or designed before the implementation of projects and programs being evaluated. There generally were no criteria for deciding what should be evaluated, how often, when, and what level of evaluation (i.e., monitoring through intensive, controlled experimentation) is appropriate.

Evaluation findings, conclusions, and recommendations were frequently imprecise, and there were no standards for reporting evaluation results. Also, States had no procedures for determining the validity and reliability of evaluation results.

In "Difficulties of Assessing Results of Law Enforcement Assistance Administration Projects To Reduce Crime" (B-171039, Mar. 19, 1974), we examined evaluation reporting for four types of projects--alcohol detoxification centers, youth service bureaus, group homes for juveniles, and drug counseling centers--and determined that:

- Inadequate evaluation criteria had led to inconsistency in evaluation reports on projects. Data provided had been insufficient to allow management to make objective decisions regarding project success.
- Different aspects of some project operations had focused on using different (or noncomparable) evaluative techniques.
- Attempts had been made to compare operations of two different projects despite a significant difference in philosophies of treatment (project services) to be provided.

--Depth of assessment for another project had been limited to identifying the adequacy of the project's facilities and staff. Views of the project's usefulness and success had been obtained from clients and a police department.

We concluded there were common difficulties in trying to assess the impact of the four types of projects reviewed:

--No standards or criteria had been established regarding success rates.

--Adequate and comparable data was not maintained for similar projects.

--Project evaluations used different techniques and different information sources and had different scopes. Moreover, most evaluations did not present data on project effectiveness, and for those that did, the evaluators had no nationally acceptable standards or criteria to use in evaluating project achievement.

Without comparable data, adequate standards and criteria cannot be developed, and objective decisions cannot be made regarding the merits of such projects and the desirability of emphasizing such approaches to help reduce crime.

To determine whether there has been any progress in the adequacy of evaluation work performed, we obtained information on, and assessed a sample of, 42 completed evaluations from the 4 States visited (i.e., evaluations completed between 1973 and 1975) by applying a 22-element checklist. 1/

For each of the evaluation reports/studies, we determined how well each report element had been addressed using the following scale. 2/

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1/This checklist was developed for use in conducting this review and does not represent or imply official GAO standards for evaluation, which were not finalized at the time of our review.

2/The results of this assessment are shown in tables 1 to 5 on pp. 52 to 61.

1. Not present.
2. Inadequate--vague and ill-defined.
3. Poor--element minimally addressed but not clearly presented in a logical manner.
4. Adequate--logical presentation which is readily understood.
5. Superior--comprehensive coverage of the element with sound, logical treatment and definition of all concepts and terms to facilitate the readers' understanding.

### EVALUATION WORK PERFORMED HAS SIGNIFICANT DEFICIENCIES

In just over 52 percent of the evaluation reports, the evaluation did not provide a clear statement of the problem which the project was addressing. Only 10 evaluations adequately did so. The balance were rated "inadequate" or "poor." No evaluation was rated "superior."

Fifty-five percent of the reports did not present project hypotheses or relate them to the projects' intended goals and objectives. An additional 26 percent were rated inadequate or poor.

Almost 70 percent of the reports did not state the primary assumptions upon which the projects' goals, objectives, and activities were based. Only five studies "adequately" addressed this item. None were rated superior.

Seventy-one percent of the reports did not present, discuss, or draw upon previous, related research or evaluations in their examination of the goals, objectives, activities, hypotheses, or problem statements of the projects being evaluated. Nineteen percent were rated inadequate or poor. Only 3 of 42 were rated as adequate and 1 as superior.

### Evaluation methodology

Of the 42 evaluations only 8 (19 percent) adequately set forth and described the evaluation research design and methodology used. In 26 percent of the cases, it was "not present." Of the remaining evaluation reports, 21 percent were rated as inadequate and 33 percent as poor and none were rated superior.

Only 33 percent adequately presented and defined terms and concepts related to the goals, objectives, implementation activities, hypotheses, and problem statements of the projects.

Sixty-four percent did not define the sample (i.e., portion of the populations or areas studied) or state procedures for deriving the sample. In 48 percent of the cases, there was no evidence that data-gathering methods and procedures had been followed in conducting the evaluations. The procedures for the statistical analysis of data were stated adequately in only 2 of 42 evaluations. In 71 percent of the cases, they were not presented at all. In 62 percent there was no evidence that methodological and statistical procedures had been followed in the conduct of the evaluation studies. Only 8 of the 42 cases adequately followed through in implementing these procedures.

Procedures to determine the validity and reliability of the evaluation measures used and data gathered were adequately presented in only 4 of the 42 studies. No statement of such procedures was evident in 79 percent of the cases. Further, less than 15 percent implemented adequate procedures for validation and reliability checks on measures used and data obtained.

#### Presentation of evaluation findings

Only 11 of 42 evaluations (26 percent) adequately presented a statement of findings which specified project outcomes based on an analysis of data and information. Fifty-two percent of the remaining evaluations were rated inadequate or poor. Conclusions drawn from analysis and evaluation findings were not presented in 5 of the 42 evaluations; 62 percent were rated inadequate or poor. Slightly less than half of the evaluations did not present any recommendations based on an analysis of results, presentation of findings, and valid interpretation of conclusions. Only 6 of 42 reports provided an adequate, concise, executive-type summary of project goals, objectives, and results, drawing conclusions and making recommendations, where appropriate.

#### DEFICIENCIES IN PRIOR EVALUATIONS LIMIT NEP RESULTS

NEP phase 1 studies draw on project information and results and prior evaluations done in selected topic areas. Separate grants are made for conducting the studies. The significant deficiencies in the evaluation work being performed by the States and the assessments made of them by

those conducting phase I studies will affect the validity, reliability, and relevance of information being generated.

Previous studies and some evaluations done on LEAA projects mainly involved monitoring, which did not include outcome data. Thus the scope of phase I assessments in producing information about project effectiveness and program impact was limited. Although those executing phase I assessments review the design and methodology of evaluation work and studies previously done on projects in their topic areas, they do not validate evaluation data.

#### Other difficulties in implementing NEP

Also, there are difficulties in implementing the NEP process itself which can affect the quality and utility of NEP results. A phase I study requires that those conducting the assessment have expertise in both methodology and program content in relation to their topic areas. According to a technical advisor providing assistance to LEAA in the NEP effort, grantees to conduct phase I studies are scarce and there has been a problem in obtaining grantees that are competent and willing to do the phase I studies. The extensive time required to process a phase I grant through LEAA's approval process has been cited by the technical advisor as contributing to this problem. He recommended that the timing of the awards cycle be altered or that a more realistic estimate of the actual award date be provided to prospective grantees at the outset.

Problems encountered in describing, bounding, delimiting, and defining topic areas for phase I studies also affect NEP efforts. Phase I studies are conducted in selected topic areas which are purported to contain projects that appear to have similar goals and methods. But there are problems in determining the topic area universe and identifying individual projects to be included in these topic areas. Information is not readily available to determine the amount of funds and number of grants awarded for individual projects differentiated by topic areas. The NEP technical advisor found that the content descriptions in LEAA's automated Grants Management Information System did not create adequate, exclusive, or exhaustive sets of project types. The system is not organized along a model or framework of the criminal justice system and thus forces a project-by-project type of assessment. The lack of common descriptors for differing areas also contributes to problems in discussing types of projects with people working in the field.

TABLE 1  
SUMMARY OF GAO RATING OF EVALUATION REPORTS

EVALUATION REPORT ELEMENT	NOT PRESENT			INADEQUATE			POOR			ADEQUATE			SUPERIOR			TOTALS (note a)		
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%		
1. Statement of problem to which the project is addressed	22	52.4	3	7.1	7	16.7	10	23.8	-	-	-	-	-	-	-	-	42	100
2. Statement of project hypotheses in relation to project goals and objectives	23	54.8	7	16.7	5	11.9	6	14.3	1	2.4	-	-	-	-	-	-	42	100
3. Statement of assumptions upon which project goals, objectives, and activities are based	29	69.0	3	7.1	5	11.9	5	11.9	-	-	-	-	-	-	-	-	42	100
4. Presentation of related previous research and evaluation findings in relation to project goals, objectives, activities, hypotheses, and problem statement	30	71.4	5	11.9	3	7.1	3	7.1	1	2.4	-	-	-	-	-	-	42	100
5. Definition of terms and concepts related to project goals, objectives, implementation activities, hypotheses, and problem statement	12	28.6	7	16.7	9	21.4	14	33.3	-	-	-	-	-	-	-	-	42	100
6. Research methodology and evaluation design	11	26.2	9	21.4	14	33.3	8	19.0	-	-	-	-	-	-	-	-	42	100
7. Definition of project sample (proportion of population or area studied), and procedures for deriving the sample	27	64.3	4	9.5	2	4.8	9	21.4	-	-	-	-	-	-	-	-	42	100
8. Statement of data collection/gathering methods and procedures	11	26.2	5	11.9	12	28.6	14	33.3	-	-	-	-	-	-	-	-	42	100
9. Data collection/gathering methods and procedures were followed	20	47.6	1	2.4	10	23.8	11	26.2	-	-	-	-	-	-	-	-	42	100
10. Definition of procedures for the statistical analysis of data	30	71.4	5	11.9	5	11.9	2	4.8	-	-	-	-	-	-	-	-	42	100
11. Procedures for the statistical analysis of data were followed	26	61.9	5	11.9	3	7.1	8	19.0	-	-	-	-	-	-	-	-	42	100
12. Statement of procedures to assure the validity and reliability of evaluation measures and data	31	73.8	3	7.1	4	9.5	4	9.5	-	-	-	-	-	-	-	-	42	100

13. Procedures to assure the validity and reliability of evaluation measures and data were followed	33	78.6	1	2.4	2	4.8	6	14.3	-	-	42	100
14. Evaluation research design for the treatment of problem statement; project hypotheses; assumptions; and defines goals, objectives, activities, and past effort	14	33.3	12	28.6	11	26.2	5	11.9	-	-	42	100
15. Description of population or area to which the project is addressed	10	23.8	11	26.2	10	23.8	10	23.8	1	2.4	42	100
16. Statement of evaluation findings and project outcomes based upon an analysis of data	7	16.7	9	21.4	13	31.0	11	26.2	2	4.8	42	100
17. Clear statement of evaluation conclusions	5	11.9	12	28.6	15	35.7	9	21.4	1	2.4	42	100
18. Statement of overall evaluation conclusions is based on the results of an analysis of data, evaluation findings, and conclusions	5	11.9	15	35.7	11	26.2	10	23.8	1	2.4	42	100
19. Generalization of the interpretation of evaluation findings and conclusions is limited to the population or area sampled and studied	16	38.1	8	19.0	4	9.5	13	31.0	1	2.4	42	100
20. Presentation of recommendations based on the results of data analysis, evaluation findings, and conclusions	20	47.6	5	11.9	8	19.1	9	21.4	-	-	42	100
21. Evaluation is written in an unbiased and objective manner, clarifying the author's position where opinions are given without evidence based on findings	2	4.8	12	28.6	11	26.2	15	35.7	2	4.8	42	100
22. Executive summary of evaluation findings, conclusions, and recommendations; including a statement of outcomes based on project goals and objectives	20	47.6	8	19.0	8	19.0	6	14.3	-	-	42	100
Totals	404	43.7	150	16.2	172	18.6	188	20.3	10	1.1	924	100

a/Some percentages may not total due to rounding.

TABLE 2  
 CAO RATING OF EVALUATION REPORTS - OREGON

EVALUATION REPORT ELEMENT	PRESENT		INADEQUATE		POOR		ADEQUATE		SUPERIOR		TOTALS (note a)		
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
1. Statement of problem to which the project is addressed	11	91.7	-	-	1	8.3	-	-	-	-	-	12	100
2. Statement of project hypotheses in relation to project goals and objectives	7	58.3	2	16.7	1	8.3	2	16.7	-	-	-	12	100
3. Statement of assumptions upon which project goals, objectives, and activities are based	8	66.7	2	16.7	1	8.3	1	8.3	-	-	-	12	100
4. Presentation of related previous research and evaluation findings in relation to project goals, objectives, activities, hypotheses, and problem statement	8	66.7	2	16.7	-	-	2	16.7	-	-	-	12	100
5. Definition of terms and concepts related to project goals, objectives, implementation activities, hypotheses, and problem statement	5	41.7	2	16.7	3	25.0	2	16.7	-	-	-	12	100
6. Research methodology and evaluation design	6	50.0	2	16.7	2	16.7	2	16.7	-	-	-	12	100
7. Definition of project sample (proportion of population or area studied), and procedures for deriving the sample	7	58.3	2	16.7	-	-	3	25.0	-	-	-	12	100
8. Statement of data collection/gathering methods and procedures	6	50.0	1	8.3	2	16.7	3	25.0	-	-	-	12	100
9. Data collection/gathering methods and procedures were followed	6	50.0	1	8.3	3	25.0	2	16.7	-	-	-	12	100
10. Definition of procedures for the statistical analysis of data	5	41.7	4	33.3	2	16.7	1	8.3	-	-	-	12	100
11. Procedures for the statistical analysis of data were followed	5	41.7	3	25.0	1	8.3	3	25.0	-	-	-	12	100
12. Statement of procedures to assure the validity and reliability of evaluation measures and data	9	75.0	1	8.3	-	-	2	16.7	-	-	-	12	100



13. Procedures to assure the validity and reliability of evaluation measures and data were followed	9	75.0	1	8.3	-	2	16.7	-	-	12	100	
14. Evaluation research design for the treatment of problem statement; project hypotheses; assumptions; and defines goals, objectives, activities, and past effort	6	50.0	2	16.7	3	25.0	1	8.3	-	12	100	
15. Description of population or area to which the project is addressed	4	33.3	4	33.3	1	8.3	3	25.0	-	12	100	
16. Statement of evaluation findings and project outcomes based upon an analysis of data	1	8.3	5	41.7	5	41.7	-	-	1	8.3	100	
17. Clear statement of evaluation conclusions	1	8.3	5	41.7	5	41.7	-	-	1	8.3	100	
18. Statement of overall evaluation conclusions is based on the results of an analysis of data, evaluation findings, and conclusions	1	8.3	6	50.0	3	25.0	1	8.3	1	8.3	100	
19. Generalization of the interpretation of evaluation findings and conclusions is limited to the population or area sampled and studied	4	33.3	4	33.3	2	16.7	1	8.3	1	8.3	100	
20. Presentation of recommendations based on the results of data analysis, evaluation findings, and conclusions	8	66.7	2	16.7	1	8.3	1	8.3	-	12	100	
21. Evaluation is written in an unbiased and objective manner, clarifying the author's position where opinions are given without evidence based on findings	-	-	5	41.7	5	41.7	1	8.3	1	8.3	100	
22. Executive summary of evaluation findings, conclusions, and recommendations; including a statement of outcomes based on project goals and objectives	6	50.0	4	33.3	2	16.7	-	-	-	12	100	
Totals	123	46.6	60	22.7	43	16.3	33	12.5	5	1.9	264	100

TABLE 3  
 GAO RATING OF EVALUATION REPORTS - KANSAS

EVALUATION REPORT ELEMENT	PRESENT		INADEQUATE		POOR		ADEQUATE		SUPERIOR		TOTALS (note a)	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
1. Statement of problem to which the project is addressed	2	66.7	1	33.3	-	-	-	-	-	-	3	100
2. Statement of project hypotheses in relation to project goals and objectives	2	66.7	1	33.3	-	-	-	-	-	-	3	100
3. Statement of assumptions upon which project goals, objectives, and activities are based	2	66.7	-	-	1	33.3	-	-	-	-	3	100
4. Presentation of related previous research and evaluation findings in relation to project goals, objectives, activities, hypotheses, and problem statement	1	33.3	2	66.7	-	-	-	-	-	-	3	100
5. Definition of terms and concepts related to project goals, objectives, implementation activities, hypotheses, and problem statement	1	33.3	1	33.3	1	33.3	-	-	-	-	3	100
6. Research methodology and evaluation design	-	-	1	33.3	2	66.7	-	-	-	-	3	100
7. Definition of project sample (proportion of population or area studied), and procedures for deriving the sample	2	66.7	1	33.3	-	-	-	-	-	-	3	100
8. Statement of data collection/gathering methods and procedures	-	-	1	33.3	1	33.3	1	33.3	-	-	3	100
9. Data collection/gathering methods and procedures were followed	-	-	-	-	-	-	3	100.0	-	-	3	100
10. Definition of procedures for the statistical analysis of data	3	100	-	-	-	-	-	-	-	-	3	100.
11. Procedures for the statistical analysis of data were followed	3	100	-	-	-	-	-	-	-	-	3	100
12. Statement of procedures to assure the validity and reliability of evaluation measures and data	2	66.7	-	-	1	33.3	-	-	-	-	3	100

13. Procedures to assure the validity and reliability of evaluation measures and data were followed	2	66.7	-	-	1	33.3	-	-	-	-	3	100
14. Evaluation research design for the treatment of problem statement; project hypotheses; assumptions; and defines goals, objectives, activities, and past effort	-	-	2	66.7	1	33.3	-	-	-	-	3	100
15. Description of population or area to which the project is addressed	1	33.3	1	33.3	1	33.3	-	-	-	-	3	100
16. Statement of evaluation findings and project outcomes based upon an analysis of data	-	-	-	-	1	33.3	2	66.7	-	-	3	100
17. Clear statement of evaluation conclusions	-	-	1	33.3	1	33.3	1	33.3	-	-	3	100
18. Statement of overall evaluation conclusions is based on the results of an analysis of data, evaluation findings, and conclusions	-	-	1	33.3	1	33.3	1	33.3	-	-	3	100
19. Generalization of the interpretation of evaluation findings and conclusions is limited to the population or area sampled and studied	1	33.3	1	33.3	-	-	1	33.3	-	-	3	100
20. Presentation of recommendations based on the results of data analysis, evaluation findings, and conclusions	1	33.3	-	-	1	33.3	1	33.3	-	-	3	100
21. Evaluation is written in an unbiased and objective manner, clarifying the author's position where opinions are given without evidence based on findings	-	-	1	33.3	-	-	2	66.7	-	-	3	100
22. Executive summary of evaluation findings, conclusions, and recommendations; including a statement of outcomes based on project goals and objectives	2	66.7	-	-	1	33.3	-	-	-	-	3	100
Totals	25	37.9	15	22.7	14	21.2	12	18.2	-	-	66	100

a/Some percentages may not total due to rounding.

TABLE 4  
 GAO RATING OF EVALUATION REPORTS - PENNSYLVANIA

EVALUATION REPORT ELEMENT	NOT PRESENT		INADEQUATE		POOR		ADEQUATE		SUPERIOR		TOTALS (note a)	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
1. Statement of problem to which the project is addressed	6	46.2	1	7.7	5	38.5	1	7.7	-	-	13	100
2. Statement of project hypotheses in relation to project goals and objectives	8	61.5	2	15.4	2	15.4	1	7.7	-	-	13	100
3. Statement of assumptions upon which project goals, objectives, and activities are based	11	84.6	-	-	2	15.4	-	-	-	-	13	100
4. Presentation of related previous research and evaluation findings in relation to project goals, objectives, activities, hypotheses, and problem statement	10	76.9	1	7.7	2	15.4	-	-	-	-	13	100
5. Definition of terms and concepts related to project goals, objectives, implementation activities, hypotheses, and problem statement	3	23.1	4	30.8	4	30.8	2	15.4	-	-	13	100
6. Research methodology and evaluation design	3	23.1	5	38.5	4	30.8	1	7.7	-	-	13	100
7. Definition of project sample (proportion of population or area studied), and procedures for deriving the sample	8	61.5	1	7.7	1	7.7	3	23.1	-	-	13	100
8. Statement of data collection/gathering methods and procedures	2	15.4	2	15.4	6	46.2	3	23.1	-	-	13	100
9. Data collection/gathering methods and procedures were followed	2	15.4	-	-	6	46.2	5	38.5	-	-	13	100
10. Definition of procedures for the statistical analysis of data	11	84.6	-	-	2	15.4	-	-	-	-	13	100
11. Procedures for the statistical analysis of data were followed	7	53.8	1	7.7	2	15.4	3	23.1	-	-	13	100
12. Statement of procedures to assure the validity and reliability of evaluation measures and data	11	84.6	1	7.7	1	7.7	-	-	-	-	13	100

13. Procedures to assure the validity and reliability of evaluation measures and data were followed	12	92.3	-	-	-	1	7.7	-	-	13	100	
14. Evaluation research design for the treatment of problem statement; project hypotheses; assumptions; and defines goals, objectives, activities, and past effort	3	23.1	5	38.5	4	30.8	1	7.7	-	13	100	
15. Description of population or area to which the project is addressed	3	23.1	2	15.4	6	46.2	1	7.7	1	7.7	13	100
16. Statement of evaluation findings and project outcomes based upon an analysis of data	1	7.7	4	30.8	3	23.1	4	30.8	1	7.7	13	100
17. Clear statement of evaluation conclusions	-	-	3	23.1	6	46.2	4	30.8	-	-	13	100
18. Statement of overall evaluation conclusions is based on the results of an analysis of data, evaluation findings, and conclusions	-	-	3	23.1	6	46.2	4	30.8	-	-	13	100
19. Generalization of the interpretation of evaluation findings and conclusions is limited to the population or area sampled and studied	2	15.4	3	23.1	2	15.4	6	46.2	-	-	13	100
20. Presentation of recommendations based on the results of data analysis, evaluation findings, and conclusions	-	-	3	23.1	5	38.5	5	38.5	-	-	13	100
21. Evaluation is written in an unbiased and objective manner, clarifying the author's position where opinions are given without evidence based on findings	-	-	4	30.8	3	23.1	5	38.5	1	7.7	13	100
22. Executive summary of evaluation findings, conclusions, and recommendations; including a statement of outcomes based on project goals and objectives	2	15.4	2	15.4	5	38.5	4	30.8	-	-	13	100
Totals	105	36.7	47	16.4	77	26.9	54	18.9	3	1.0	286	100

TABLE 5  
 GRAO RATING OF EVALUATION REPORTS - CALIFORNIA

EVALUATION REPORT ELEMENT	PRESENT		INADEQUATE		POOR		ADEQUATE		SUPERIOR		TOTALS (note a)	
	No.	%	No.	%	No.	%	No.	%	No.	%		
1. Statement of problem to which the project is addressed	3	21.4	1	7.1	1	7.1	9	64.3	0	0	14	100
2. Statement of project hypotheses in relation to project goals and objectives	6	42.9	2	14.3	2	14.3	3	21.4	1	7.1	14	100
3. Statement of assumptions upon which project goals, objectives, and activities are based	6	57.1	1	7.1	1	7.1	4	28.6	-	-	14	100
4. Presentation of related previous research and evaluation findings in relation to project goals, objectives, activities, hypotheses, and problem statement	11	78.6	-	-	1	7.1	1	7.1	1	7.1	14	100
5. Definition of terms and concepts related to project goals, objectives, implementation activities, hypotheses, and problem statement	3	21.4	-	-	1	7.1	10	71.4	-	-	14	100
6. Research methodology and evaluation design	2	14.3	1	7.1	6	42.9	5	35.7	-	-	14	100
7. Definition of project sample (proportion of population or area studied), and procedures for deriving the sample	10	71.4	-	-	1	7.1	3	21.4	-	-	14	100
8. Statement of data collection/gathering methods and procedures	3	21.4	1	7.1	3	21.4	7	50.0	-	-	14	100
9. Data collection/gathering methods and procedures were followed	12	85.7	-	-	1	7.1	1	7.1	-	-	14	100
10. Definition of procedures for the statistical analysis of data	11	78.6	1	7.1	1	7.1	1	7.1	-	-	14	100
11. Procedures for the statistical analysis of data were followed	11	78.6	1	7.1	-	-	2	14.3	-	-	14	100
12. Statement of procedures to assure the validity and reliability of evaluation measures and data	9	64.3	1	7.1	2	14.3	2	14.3	-	-	14	100

13. Procedures to assure the validity and reliability of evaluation measures and data were followed	10	71.4	-	-	1	7.1	3	21.4	-	-	14	100
14. Evaluation research design for the treatment of problem statement; project hypotheses; assumptions; and defines goals, objectives, activities, and past effort	5	35.7	3	21.4	3	21.4	3	21.4	-	-	14	100
15. Description of population or area to which the project is addressed	2	14.3	4	28.6	2	14.3	6	42.9	-	-	14	100
16. Statement of evaluation findings and project outcomes based upon an analysis of data	5	35.7	-	-	4	28.6	5	35.7	-	-	14	100
17. Clear statement of evaluation conclusions	4	28.6	3	21.4	3	21.4	4	28.6	-	-	14	100
18. Statement of overall evaluation conclusions is based on the results of an analysis of data, evaluation findings, and conclusions	4	28.6	5	35.7	1	7.1	4	28.6	-	-	14	100
19. Generalization of the interpretation of evaluation findings and conclusions is limited to the population or area sampled and studied	9	64.3	-	-	-	-	5	35.7	-	-	14	100
20. Presentation of recommendations based on the results of data analysis, evaluation findings, and conclusions	11	78.6	-	-	1	7.1	2	14.3	-	-	14	100
21. Evaluation is written in an unbiased and objective manner, clarifying the author's position where opinions are given without evidence based on findings	2	14.3	2	14.3	3	21.4	7	50.0	-	-	14	100
22. Executive summary of evaluation findings, conclusions, and recommendations; including a statement of outcomes based on project goals and objectives	10	71.4	2	14.3	-	-	2	14.3	-	-	14	100
Totals	151	49.0	28	9.1	38	12.3	89	28.9	2	0.6	308	100

a/Some percentages may not total due to rounding.

Other problems encountered in defining topic areas include (1) an absence or inadequate description and definition of actual project objectives and (2) a lack of standardized measures of effectiveness or performance in the criminal justice field.

A director of a nationally recognized research organization has also noted that one problem in trying to do evaluations of LEAA projects is the inadequacy in shaping, describing, and specifying objectives to be accomplished by any given project or program activity. Under the current system, for example, although a project may be titled a prevention project, it might be anything else but. One of the deficiencies of the phase I approach is that it identifies program efforts on the basis of the project titles. LEAA evaluation efforts should focus on how to plan projects so that they do group into program areas. The effort to design an evaluation for a conglomeration of projects that are all going their own way would be self-defeating.

The lack of standardized measures of effectiveness or performance in the criminal justice field has also been cited by LEAA's Evaluation Policy Working Group as a clear limitation in achieving LEAA's Evaluation Knowledge Goal. The group recommended that LEAA programs be used to begin to define such measures. The NEP director also noted that evaluations of LEAA projects are hampered by an absence of performance measures.

In addition, NEP is hampered by an absence of readily available data needed for evaluation on current projects. At the time of our review, LEAA did not know what data were needed to be able to measure the impact of projects; thus it could not tell the States in advance what they would be responsible for collecting and by when. Yet LEAA guidelines required the States to provide these data upon request. LEAA officials hoped that phase I studies would be able to determine what data and information need to be collected. The information systems available at LEAA did not contain the type of data needed to fully implement NEP.

The impact of phase I studies on LEAA's evaluation Knowledge Goal has been hampered by problems in developing the six products and overall summary phase I grantees must give LEAA.

--Product 1 is a paper outlining the issues and views of the topic area as identified and described by the phase I grantee; the issues and views are based mostly on available information, general knowledge, and past findings.



←-Product 2 requires a process-flow diagram which is to include the intervention (project strategy) actually employed by projects in the topic areas.

--Product 3 is a framework of assumptions upon which the projects in a topic area are presumed to rest. This is to be used to (1) trace the link between these assumptions and project activities or intervention strategies, (2) identify the relationship between the intervention strategy(ies) and immediate outcomes of the projects, and (3) determine whether these immediate outcomes have impacted on the problem addressed in the topic area. Product 3 should also include data collection information, such as potential measurement points, data elements needed, and suggested measurement methods.

--Product 4 is an assessment of what is known about the success or failure of projects in a topic area and is to point out gaps in the knowledge of the topic area.

--Product 5 is an evaluation design structured to fill information gaps on the success and failure of projects, including estimates of the feasibility and cost of obtaining this knowledge. Product 5 has also been described as a design for a potential phase II study.

--Product 6 is a model data collection and evaluation design, which is an adaptation of product 3, for possible use in evaluating individual projects at the State and local level.

The NEP phase I summary is designed for use by State and local criminal justice personnel.

The NEP technical advisor has found that product 3 (framework of assumptions) should have been described as a measurement model to reflect more accurately the type of product originally envisioned. Resultant phase I studies the advisor had reviewed up until the time of our review had not provided for the measurement models that he had anticipated. Furthermore, problems have been experienced in the delivery of all of the products required of phase I grantees. The phase I grants are for about \$100,000 each, and according to the technical advisor, it may be too much to ask for six products and a

well-written summary considering the time frames and resources available to phase I grantees. Some grantees have difficulty producing summaries of their studies.

EVALUATIONS HAVE GENERALLY NOT BEEN PLANNED  
OR DESIGNED BEFORE PROJECT IMPLEMENTATION

To successfully plan a project, the most essential step toward cogent evaluation is the clear definition of objectives. Poorly formulated objectives affect every aspect of a project's execution, as well as the quality of the evaluation. For the purpose of this discussion, objectives may be categorized as being of two basic types: interim and outcome.

An "interim objective" is defined as a statement of designed change in an existing state of affairs as a direct and immediate result of specific actions taken (i.e., project operations or inputs) totally under the control of the activities to be engaged in. Examples include:

- Improved self-concepts will result in decreased delinquent behavior. (Here improving "self-concept" is the interim objective.)
- Increased employment or better jobs will reduce the incidence of reoffenses. (Here "increasing employment" and "better jobs" are the interim objectives.)

An "outcome objective" is defined as a statement of anticipated and observable result(s) or end-states to be produced by an identified activity, specifying the situation in which it is expected and how it will be measured. Outcome objectives are susceptible to systematic evaluation. Typical examples of outcome objectives in LEAA/SPA-funded projects include: reducing the quantity of crime, increasing the number of arrests, reducing recidivism, reducing drug use, or decreasing court delay. Measuring outcome objectives is, by nature, central to cogent evaluation research and is technically and economically feasible. However, many outcome objectives of interest have not been accurately measured due to the lack of adequate evaluation planning and design before the projects are implemented among other factors noted previously. Such problems were exemplified in California's assessment of the evaluability of projects to be funded by the SPA.

In reviewing project descriptions in RFP plans, California defined 363 projects as having high enough priority as to be likely to be funded. Of these, a sample of 47 projects

were broken down into two, three, or four parts because they entered into two or more program categories on the breakdown scheme employed. This provided a total of 423 project or project parts in the analysis. Of these, 121 had no outcome objectives. All the objectives of the projects or project parts in this category had some interim objectives, which could be subjected to evaluation. However, the majority of the projects did not operationally define objectives in a manner which rendered them amenable to measurement, although most objectives could have been operationally defined had adequate evaluation planning taken place.

Several program areas included project activities commonly accepted as being evaluable, and yet provision for their systematic evaluation was limited or nonexistent. These areas included the upgrading of law enforcement personnel, diversion from the criminal justice system, community-based treatment of first offenders, and establishment of special units devoted to research and development or to planning. In some program areas, there will always be some classes of projects which do not have outcome objectives, for example, the building of a new jail facility or a new police headquarters. Therefore, some projects can be classified in advance as not requiring intensive evaluation, except for perhaps a limited cost-benefit analysis.

According to California's assessment, projects in other program categories showed poor attention to evaluation even though the majority of them could have included measurable outcome objectives.

In California's assessment, almost every area examined had far too many projects without any measurable objectives. For example, in the corrections and juvenile delinquency prevention areas, one finds a project generated from a mental health orientation in which providing some kind of counseling or therapy is regarded as an end in itself. Such projects promise only to provide counseling or therapy and do not mention any outcome objectives, such as a reduction of recidivism or crime rate. Thus, if examined on the basis of their own definition, those projects would not be amenable to a systematic evaluation in terms of impact or effectiveness.

The assessment revealed that slightly more than 50 percent of the projects or project parts (224 of 423) had one or more evaluable objective(s). This may suggest a more optimistic situation than was actually the case. It was estimated, from the descriptions in this SPA's RPU plans, that the majority of these projects have suggested clear

evaluable objectives, with no intention of undertaking a critical evaluation to see whether these objectives are, in fact, realized. To promise a reduction in crime or a decrease in recidivism is easy if there is no intention of looking to see whether, in fact, the project produced these changes.

Clearly, there is a need to improve the process to provide evaluation planning to commence concurrently with the specification and definition of project objectives. This will facilitate specification of objectives in terms amenable to measurement. In the four States visited, such efforts, where they exist, are limited.

### Oregon

SPA personnel criticized the quality of block grant evaluation efforts. SPA staff said that although they believed that an adequate review of project applications is important to assure that projects can be evaluated (e.g., review of the adequacy of project objectives and the evaluation components), this had not been adequately done in the past. Consequently, the quality of evaluation reports has been adversely affected. Several reasons were cited as contributing to the problem of inadequate review:

- A lack of sufficient staff.
- The 90-day time limit required by LEAA for review of subgrant applications does not allow enough time for staff review.
- The current review of the adequacy of the evaluation component (of each project application) is not done until after the project is approved for funding; this approach limits the degree to which appropriate changes can be made.

One SPA staff member told us that of the 12 or 13 "third-party" evaluations he was familiar with, all but 1 were inconclusive. For example, one evaluation report consisted of 300 pages; near the end of the report, the evaluator said the project had not been designed to allow for evaluation.

### Pennsylvania

Evaluations of specific projects cannot officially begin until after the subgrant has been awarded. Subgrant funds set aside for project evaluation, therefore, are not available for evaluation planning and design before award.

Nor are these funds available to permit followup evaluation since they are not available once the subgrant period has expired.

Although the SPA's evaluation and monitoring guidelines state that project applications must contain measurable objectives to allow for evaluation, we question whether the SPA can enforce these guidelines because of the decentralization of most of the planning and evaluation functions to the RPUs.

### Kansas

The review of subgrant applications to assure their evaluability was inadequate and did not represent more than a statement of intent. Furthermore, the SPA's evaluation guidelines did not provide for any standards or format indicating what an evaluation must contain.

### California

The SPA, at the time of our review, did not have an evaluation program; consequently, it was not providing evaluation guidance to RPUs, nor did it know the nature and extent of each RPU's involvement in evaluation.

We examined the activities and efforts of the statewide California Evaluation Program that were being implemented before the 1975 reorganization. Considerable effort had been devoted, in conjunction with the RPUs, to providing assistance and support in the planning and design of evaluation prior to project implementation. About \$500,000 had been allocated to this effort. However, we found no evidence of a successor to this evaluation program activity.

### ABSENCE OF CRITERIA TO DECIDE WHAT, HOW OFTEN, AND WHEN TO EVALUATE AND AT WHAT LEVEL

In all the States visited, there was a paucity of definitive criteria to determine what, how much, and when to evaluate and at what level. Although the Pennsylvania SPA's evaluation and monitoring guidelines suggest what could be considered in making such decisions, these guidelines are so broad that they are implemented in significantly different ways, and the RPUs experience different results.

### Oregon

The SPA director informed us that the SPA has no standards or criteria for deciding:

- What projects should or should not be evaluated.
- How many and at what level projects should be evaluated.
- Who should do the evaluations.
- What each level of evaluation should consist of (for example, periodic onsite monitoring through more rigorous intensive evaluation).

### California

Before January 1975 the SPA supervisory board required, as policy, that each funded project be evaluated. However, the rate of completed evaluations through 1972 averaged 30 percent of the number of projects funded. Between 1973 and 1975 the SPA elected to evaluate, on a program-level basis, projects in a significant program area--diversion of adults and juveniles from the justice system. This effort involved about 105 projects in fiscal year 1974.

At the time of our review, the SPA had not imposed evaluation requirements and had not established an evaluation program to replace the statewide California Evaluation Program, which ceased to operate about mid-1975.

### Kansas

The SPA has no formal criteria as to which projects are to be intensively evaluated. The research and evaluation staff "\* \* \* target specific projects that could be intensively evaluated by contract award to LEAA, the National Evaluation Program and the Full Committee [SPA supervisory board]." At the time of our review, the SPA's evaluation guidelines were not formalized or adopted. Preliminary guidelines consisted of a five-point outline of what prospective subgrantees are expected to address in their applications for Federal funds:

- Statement of goals, objectives, and evaluation timetable.
- Identification of evaluation measures.
- Development of data needs.
- Determination of data analysis methods.
- Use of project history log.

## Pennsylvania

The SPA has adopted general guidelines and recommended their use by RPU's in selecting projects to evaluate. Five categories of projects were suggested as a guide as to the kinds of projects which should be considered for evaluation.

1. Projects which are particularly innovative, controversial, or potentially dramatic in impact, as well as model pilot projects with potential for replication throughout the RPU or the State.
2. Those projects of a technical or programmatic nature which extend them outside the bounds of regional staff expertise.
3. Multifaceted projects which would require excessive staff time to monitor effectively.
4. Projects thought to be potentially viable but whose operations and management could benefit by the implementation of systematic and constructive evaluation.
5. Those projects which represent a substantial investment of regional funds, i.e., those significantly in excess of the median regional subgrant.

The guidelines further suggest that independent evaluations generally should not be considered for: (1) projects primarily concerned with constructing facilities or purchasing equipment, (2) projects that are expansions of ongoing activities whose results are already known, or (3) projects for which independent evaluations are not considered cost effective. In addition, the guidelines state

"In determining the level of assessment to be used for any project, the key factor to be considered is the information needs of the project, the Regional Planning Council, and the SPA."

To ascertain how these guidelines are applied, we visited two RPU's to see how projects were selected for assessment. Both RPU's received similar guidance from the SPA in the form of the LEAA guideline manual, the evaluation and monitoring guidelines, and telephone contacts with the director of the SPA's Evaluation and Monitoring Unit. In addition, one RPU indicated it had received personal visits from the director of the SPA's Evaluation and Monitoring Unit.

RPU "A" (which receives a large share of funds made available to local governments) uses independent evaluators to evaluate all projects, except those receiving \$10,000 or less in Federal funds, unless independent evaluation is deemed necessary by the RPU director; continuation projects which have proven their merit; or minor equipment projects involving less than \$20,000 to \$30,000. Although the above kinds of projects are not evaluated independently, this RPU's policy is to monitor such projects using RPU staff.

RPU "B" relies primarily on the fifth criterion in the SPA's evaluation and monitoring guidelines in selecting projects for independent evaluation (i.e., projects representing a substantial investment of funds allocated to the region). Under this criterion 5 to 10 projects receiving over \$75,000 in Federal funds are selected each year for independent evaluation. All projects which receive \$75,000 or less in Federal funds are assessed by the RPU staff as much as possible. The evaluation staff consists of one individual, plus student interns on occasion. The RPU planned to require the planners or field representatives responsible for administering the projects to monitor them. This was being done informally.

At the SPA level, the only projects considered for evaluation are (1) those State agency or statewide impact projects funded by LEAA discretionary grants or SPA State share parts C and E block subgrants or (2) those that the RPU has decided not to independently evaluate but which are important as model/demonstration projects or which are part of a program evaluation being conducted by the SPA Evaluation and Monitoring Unit. The SPA's director of evaluation and staff evaluated these projects only to a limited extent because they have numerous collateral responsibilities and because, at the time of our review, the SPA evaluation staff members were relatively new employees.

According to the director of the SPA's Evaluation and Monitoring Unit, the RPUs generally select projects for evaluation and decide on the depth of the evaluation based on the criteria in the SPA's evaluation and monitoring guidelines. However, as previously discussed, the philosophies of the two RPUs visited differ as to which projects are selected for evaluation. RPU "A" independently evaluates all projects that are not specifically excluded by its own evaluation guidelines. RPU "B" independently evaluates only those projects which receive Federal funds in excess of \$75,000. Both RPUs monitor or assess projects not independently evaluated. They use a combination of quarterly progress reports, in-house assessments, internal assessments by project directors,



and occasional evaluations performed by RPU staff members. Furthermore, the SPA may not always be aware of which projects are being evaluated, or how evaluations are being, or are to be conducted; it must rely on the RPUs to give it copies of evaluation reports.

EVALUATION FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS ARE FREQUENTLY IMPRECISE

At present, many projects and intervention strategies are copied (but rarely replicated in their entirety) by others who assume that the project or component parts are effective merely because they were implemented; that is, they achieved their operational objectives, such as providing individualized counseling to 150 clients and did not receive adverse publicity. Most often those copying the project do so on the basis that it was judged to be a "good project" by criminal justice administrators and those who originally endorsed the project's development to meet certain community needs. Many officials, if not most, are not aware of whether the project was cost effective let alone cost efficient when applied or expanded to fit a larger universe of need involving increased numbers in expanded target populations or to provide wider geographic coverage.

When evaluation results cannot be interpreted and when valid conclusions applicable to current crime and delinquency reduction problems and needs cannot be drawn, substantial resources often need to be reinvested to explore the question a second or even a third time.

Based on our review of a sample of completed evaluations obtained from the four States visited, results of interviews with SPA and some RPU personnel, and contact with other State officials, we determined that many evaluations did not provide for an adequate presentation of evaluation findings and conclusions which specify project outcomes.

Oregon

In its application to LEAAs for additional funding for evaluations, the Oregon Law Enforcement Council expressed its frustration with the inadequacy of evaluation information.

"During the past two years, a fairly intensive monitoring effort measured and recorded operational efficiency of most OLEC [SPA] funded projects, but little was done to document the final outputs or effectiveness of these projects. Consequently, decisions relating to project refunding, adjustment

of program criteria and overall planning were largely made without the benefit of reliably based, logically collected, result-oriented data concerning project \* \* \* capabilities."  
(Underscoring supplied.)

Further, one SPA official said he knew of only three or four evaluation reports that have been used to determine the types of projects that should be funded or continued. Another official stated that one reason why some projects had inconclusive results was that some evaluation designs were not as good as they should have been.

In three evaluation reports obtained from Oregon SPA officials, we found:

- In one, the evaluation failed to assess outcome due to the lack of data; the question of the value of the project remained unanswered.
- In another, the evaluation of seven projects provided nothing more than "profile data" describing project clients.
- In a third, due to a lack of faith in the accuracy of data, an attempt was made to analyze the likelihood of a specific type of crime rather than whether that type of crime had been reduced.

Questionnaire responses from Oregon State officials not affiliated with the SPA indicated that there have been problems with understanding evaluation findings. Some responses follow.

- "Evaluators tend to write their reports in very gross technical language. Simplicity would assist in facilitating a manager's decision."
- "Professional evaluators seem to write their material for other professional evaluators. They get so hung-up with the methods used in their evaluation, the conclusion or recommendation is difficult if not impossible for non-professionals to understand."

## Kansas

The Kansas SPA also commented upon its experience with evaluations in the following excerpt from the 1976 State plan:

"Last year several intensive evaluations were attempted. The research analyst spent over three months on each one designing objective quantification models and collecting data. At the conclusion of the projects it was discovered that causal relationships between the project and the results could not be established. In order to have successfully made such a link, more time, data and additional expertise would have been necessary. \* \* \* Accordingly, it was decided that intensive evaluation would not be done by the GCCA [SPA] evaluation staff." (Underscoring supplied.)

According to available information on the SPA's attempt to evaluate projects, only three reports had been issued, each was limited in the conclusions which could be made, data supporting the assessment of project outcomes, or comparison of progress. Information on the remaining grants consisted only of bits and pieces of records that had no semblance of an evaluation.

## California

In reviewing a sample of evaluations obtained from the SPA, we determined that, of the 14 evaluations, only 5 (36 percent) adequately presented the results of analysis of evaluation data and information in a statement of findings which specified project outcomes. Four of these five evaluations stated conclusions based on an adequate analysis and presentation of findings.

Only 2 of the 14 evaluations contained an adequate executive-type summary, which concisely stated the goals, objectives, and results of the projects and which drew conclusions and made appropriate recommendations.

In a 1973 study of a sample of evaluations received, the SPA determined that:

"Approximately 20 percent of the evaluations had attempted to apply rigorous research designs to the problem of evaluation. In these research projects, the establishment of an

appropriate contrast through classical experimental and control group methodology was not validated through careful replication. In the remaining 80 percent of the projects reviewed, information provided a lower degree of certainty concerning the effectiveness of the project, since an objective demonstration of success was only possible by means of research-based evaluation. However, for the 20 percent of the projects in which such evaluation methodology was tried, most failed to provide for effective research, because of the inability to validate the establishment of contrast relationship; thus, even their potential for a high degree of certainty was not realized."

### Pennsylvania

Our review of a sample of completed evaluations indicated that 5 of 13 (38 percent) adequately stated evaluation findings and specified project outcomes; 4 of the 13 (31 percent) adequately provided evaluation conclusions based on an analysis and presentation of findings. All 13 evaluations provided recommendations, but only 5 were rated as adequate, based on an analysis of results, presentation of findings, and valid interpretation of conclusions. Further, two evaluations did not provide an executive summary; in only four of the remaining evaluations did the executive summary adequately specify project goals, objectives, results, conclusions, and appropriate recommendations.

One RPU official believed there has been some difficulty in determining the impact of projects with the initial evaluations made.

Of those State officials not affiliated with the SPA which we surveyed regarding LEAA's and the Pennsylvania SPA's evaluation programs, only half were generally satisfied with the evaluation information they had received from the SPA or LEAA.

### ABSENCE OF STANDARDS FOR REPORTING EVALUATION RESULTS

#### LEAA

In response to a questionnaire we sent to divisions and offices at LEAA headquarters, 13 of 20 units reported to have evaluation responsibilities (65 percent) indicated they had no formal evaluation standards and reporting format; 5

units indicated that they did, and 1 unit indicated that such standards and formats were not applicable to the evaluation functions they performed.

### States

No State visited had standards and formats for evaluation reporting. Consequently, there are few controls to insure comparability of evaluation data on the relative effectiveness of projects.

The Oregon SPA director told us that the SPA had not established any standards for evaluation which would specify the format of evaluation reports. He strongly believed that the SPA should also develop standardized measures and uniform criteria for assessing project results, but he stated that the Oregon SPA had not begun any activity to address the problem due to insufficient resources. Other SPA personnel told us of one attempt to develop and implement a standardized approach and design for similar projects in the area of misdemeanor corrections. But the effort collapsed due to a failure to properly coordinate and direct the evaluation effort.

Although the Pennsylvania SPA's evaluation and monitoring guidelines include sample forms, suggested formats, and guidelines for preparing evaluation reports, the Evaluation and Monitoring Unit (of the SPA) does not require strict adherence to any standardized evaluation reporting format. In addition, according to an SPA official, the SPA has no special reporting standards or format for the intensive evaluations required by the LEAA in its guidelines to the States, nor does it see any need to do so.

The Kansas SPA, at the time of our review, had no standards or format for evaluation reporting. SPA evaluation requirements were in the form of guidelines to prospective subgrantees for completion of the subgrant application. Our review of the guidelines that were proposed as part of the State's 1976 plan indicated no standards or format setting forth what an evaluation report must contain.

The California SPA did not have an evaluation program at the time of our review, the Office of Criminal Justice Planning had no established evaluation reporting standards or a standard reporting format. At one time the SPA had provided for developing evaluation standards to be used in assessing the nature and extent of the impact and effectiveness of SPA-funded programs and projects. Also, in prior years part of the statewide evaluation program involved the development of

guidelines to be used in formulating evaluation plans, designs, methodologies, implementation strategies, data collection, measurement, and information reporting formats. In addition, this program contained provisions to "cost" evaluation activities based on a variety of needs specified along with the level of evaluation to be undertaken. However, at the time of our review, such efforts were not being carried out.

PROCEDURES FOR DETERMINING  
THE VALIDITY AND RELIABILITY OF  
EVALUATION RESULTS ARE LACKING

Only half of the LEAA organizational units having evaluation responsibilities indicated they have validation processes and procedures for determining the reliability and validity of evaluation information data, treatment of data, and interpretations and conclusions drawn for evaluations they generate or sponsor. Six units indicated they had no such procedures or processes. Three additional units viewed them as not being applicable to the evaluation functions they perform. Only four of the units surveyed perform the validation process; three units indicated that this function is performed by other LEAA units. Seven units indicated they have responsibility for the validation process. Ten additional units indicated no responsibility for it or said it did not apply to their evaluation functions.

Only one LEAA unit gave us the requested copy of written evaluation procedures it follows.

In January 1975 LEAA initiated an evaluation clearinghouse as part of the National Criminal Justice Reference Service. The clearinghouse is to make information available from LEAA grants and contracts. When the evaluation clearinghouse began, the original criteria for accepting evaluation reports were minimal. Consequently, reports that were included were not judged on the basis of the quality of their analyses, data, and conclusions. Nothing was built into the system to differentiate well done studies (i.e., those in which one could have some confidence in the validity and reliability of the evaluation results) from those which were not. The SPAs provided copies of evaluation studies through the LEAA regional offices to the National Institute. However, LEAA personnel said that in lieu of attempts to validate evaluation work submitted, some of the studies now included will have to be purged from the file once more stringent criteria are adopted.

Although there appears to be some evidence that LEAA is attempting to remedy this problem, at the time of our review validation of evaluation results and information was not being carried out in any standardized fashion throughout the agency.

In two of the four LEAA regional offices there were no validation procedures and no attempts had been made to corroborate evaluation findings and conclusions.

In none of the four States was there evidence of any procedures for determining the validity and reliability of evaluation data, interpretations, or conclusions.

## CHAPTER 5

### EVALUATION INFORMATION USERS' NEEDS ARE NOT BEING MET

Our review in four States and contact with key officials in an additional two States revealed that few key State decisionmakers are consulted in advance by LEAA and the States to identify and define their evaluation information feedback needs. For the most part, dissemination and use of evaluation results are limited. Evaluation information that is eventually disseminated frequently is not available in time to be used effectively in decisionmaking and comprehensive planning. Impact evaluation information systems, previously recommended by us, have not been implemented by LEAA or any of the four States we visited.

The SPAs' management and planning processes do not systematically incorporate evaluation activities and results, and decisions to do and use evaluations are not based upon the States' comprehensive planning needs. Furthermore, LEAA's National Evaluation Program is not specifically designed, and does not target its results, to meet the specific needs of users for planning, decisionmaking, and policymaking at different levels in the intergovernmental Crime Control Act Program. Consequently, decisionmakers and policymakers tend to operate in an evaluation information vacuum.

Overall, State and local officials are not satisfied with LEAA and State evaluation efforts and information.

#### FEW DECISIONMAKERS ARE CONSULTED IN ADVANCE TO IDENTIFY THEIR EVALUATION INFORMATION NEEDS

Unless decisionmakers can participate in the process of identifying what should be evaluated, what type of information they will need, when such information will be needed, and in what form such information should be presented, the evaluation process and its products may very well not be used or be relevant.

We surveyed key State decisionmakers and policymakers for criminal justice matters, State budget directors, State legislators, representatives of State executive branch agencies, and the Governor's office in six States regarding their experience with LEAA and State evaluation programs and information. Fifty-two percent of the respondents indicated neither they nor their staffs had ever been consulted, since the Crime Control Act Program began, in decisions as to which



LEAA/SPA projects funded (or to be funded) in their States were to be formally evaluated. For fiscal year 1975, 62.5 percent of those surveyed indicated that neither they nor their staffs had been consulted about including their evaluation information needs in reporting requirements placed upon formal evaluations of LEAA and/or SPA programs and projects. In two of the States visited, decisions to evaluate are mainly in the hands of RPUs and may or may not involve local government officials.

Each SPA has a supervisory board (a policymaking body), which is concerned with the decisionmaking functions of the SPA. In 34 of the SPAs this board reviews and approves the allocation of "planning monies" (part B) to the SPA, RPUs, and local governments. Twenty-one SPAs responding to a 1975 nationwide survey conducted by the Advisory Commission on Intergovernmental Relations indicated that the supervisory body is active and influential in reviewing specific activities included in the State comprehensive plans. Only five supervisory bodies have delegated all approval and disapproval authority to SPA staff members, according to this survey.

Also, 445 RPUs in 43 States participate in comprehensive planning and, in varying degrees, share responsibility for allocating Federal funds. Local government participation in, and constitution of, RPUs has been reported to be quite high. City and county government involvement was established primarily through adopting interlocal agreements and appointing (in 52 percent of the RPUs) members as representatives on RPU supervisory bodies. The composition of these RPU supervisory bodies varies. The number of members on each board averages 27, and the average tenure is 4 years. The Crime Control Act requires that RPU supervisory bodies consist of a majority of locally elected officials. However, LEAA defined "locally elected officials" as including sheriffs, district attorneys, and judges.

Functions provided by RPUs include performing or coordinating planning for their member jurisdictions and reviewing applications for Federal funds under the act. Some RPUs are authorized to award grants to local governments or to receive and expend action funds (parts C and E) as the ultimate grantee.

Generally, RPU supervisory bodies are active in planning and funding decisions; only limited authority is delegated to staff. According to ACIR's 1975 national survey, 65 percent of these supervisory bodies approve and disapprove all grant applications (pertinent to their jurisdictions) after discussing each of them; 35 percent also review and approve specific activities in the annual RPU plan.

The 1971 amendments to the Crime Control Act required SPAs to "assure that major cities and counties \* \* \* receive planning funds to develop comprehensive plans and coordinate functions at the local level." In addition, use of part C action funds was authorized to support criminal justice coordinating councils in localities or combinations thereof having 250,000 or more people. Based on the results of the previously cited survey, 107 cities and 52 counties are served by such coordinating councils, including some of the Nation's 55 largest cities. The criminal justice coordinating councils, as well as individual local planning units, are the creations and servants of local governments. The functions of both are generally characterized by budgeting, coordination, systems analysis, evaluation, development of performance standards, and the initiation of information systems. The act requires SPAs to establish procedures whereby cities and counties (or combinations thereof) of 250,000 or more persons may submit plans to their SPAs for funding. This provision was also designed to help reduce budgetary uncertainty and funding delay.

Because of the requirement of "passing through" a certain portion of the part C block grant award to local governments, during fiscal years 1969-75 cities and counties received 33 and 30 percent of the block grant moneys, respectively; State agencies retained about 34 percent, and 30 percent went to private nongovernmental agencies.

The amount passed through to local governments has been widely diffused, as evidenced by the fact that 77 percent of 1,636 cities and counties responding to a 1975 nationwide survey reported they had received LEAA funds at some time since fiscal year 1969.

To determine the influence of decisionmakers and policymakers on SPA policies and priorities, ACIR asked the SPAs to rate the extent to which the following groups had such influence:

- Governor.
- State legislature.
- SPA supervisory board.
- SPA staff.
- State criminal justice agencies.
- RPUs.

--Local governments.

--Interest groups.

The data indicated each group exercises some influence on SPA policies and priorities. SPA supervisory boards have the greatest influence. In addition, the survey indicated 77 percent of the RPUs responding have established their own funding policies and priorities in addition to the SPAs'.

Typically, block grant funds awarded to the States by LEAA are in turn subawarded by the SPA to State agencies and local governments (and in some cases to nonprofit agencies and RPUs) for carrying out various crime reduction or system improvement activities pursuant to an LEAA-approved State comprehensive plan. Specific projects are funded on the basis of applications developed, reviewed, and approved before disbursement of funds. The State planning process is on an annual cycle, while the subgrant award process is more frequent in most cases. Responses to the 1975 ACIR survey indicated that decisions to fund subgrants (action projects) are made on a monthly basis in 26 States, bimonthly or quarterly in 7 SPAs, and once a year in 7 other SPAs. Six SPAs indicated this process occurs weekly or even more frequently. The schedule of processing, review, and approval is influenced by the volume of subgrant activity; the number of different levels of review (local government, RPU, SPA, and supervisory board); and the nature, role, and extent of involvement of each level in the process.

Thus a major element of the block grant concept, as adopted in the Crime Control Act Program, involves multiple levels of government. The Federal administrative agency (LEAA) is responsible for insuring that congressional purposes are achieved, yet permitting significant discretion in the use of funds. At the time of our review 10 LEAA regional offices were partly responsible for maintaining the necessary communication in administering the program.

The role of each level of the LEAA program network in planning, policymaking, and decisionmaking is an important consideration when viewing the question of the use and utility of evaluation processes and results. With the decentralization of authority, administration of the program, and allocation of Federal funds within an intergovernmental framework, the necessity for developing and maintaining an evaluation strategy and approach which meets a variety of evaluation information users' needs is extremely important. Unless evaluation results are available and used, they are of little value.

DISSEMINATION AND USE OF  
EVALUATION RESULTS ARE LIMITED

None of the four States visited had established systematic procedures for the dissemination and timely feedback of evaluation results for decisionmaking, State comprehensive planning, and policy formulation. Further, many of the State officials we talked with said that information generated has had limited utility for decisionmaking and planning.

Oregon

Overall, our review of the SPA indicated evaluation has minimal impact on planning and decisionmaking due to problems of quantity, quality, and timeliness noted in the previous chapters. While some evaluation user groups (or potential user groups) have been given evaluation information by LEAA and the SPA, other users (i.e., some key State officials having jurisdiction over criminal justice matters) have been neglected in the dissemination process.

As noted previously, some of these decisionmakers have not been consulted by LEAA and/or the SPA before decisions regarding which programs and projects are to be evaluated, so that their evaluation information feedback needs can be anticipated. The administrator of one of Oregon's State criminal justice agencies said neither he nor his staff had ever been consulted by LEAA or the SPA about which projects should be evaluated or about his evaluation information needs. An analyst with the Oregon State legislature said that he had never received copies of evaluation reports. He said reliable information would help his entire staff develop budget recommendations for the legislature. However, he rated both the LEAA and SPA evaluation programs as inadequate because all he had received were promises.

Another State criminal justice agency official said that while he had been consulted about the evaluation of projects, he had never received any formal reports related to his agency's functions; he also rated LEAA and the SPA's programs as inadequate in meeting evaluation users' needs.

Also, the LEAA regional office gave little feedback to the SPA regarding copies of evaluation reports of block subgrant projects forwarded to LEAA. Yet one regional office official stressed that disseminating information on effective or ineffective strategies for reducing crime and on good evaluation techniques is essential to planning and carrying out a good evaluation program. One SPA staff member felt

LEAA should be more involved in communicating directly with the SPAs about evaluation activities going on in other States.

### Pennsylvania

Evaluation information dissemination efforts of the SPA are very informal; there is no systematic method for disseminating such information to the RPUs. We were told that when a good evaluation summary is received, it is duplicated and usually sent to the RPUs and to "other interested agencies for information purposes." The director of the SPA's Evaluation and Monitoring Unit estimated that this had occurred six or eight times during a preceding 3-month period. However, there has been little response from recipients, and information disseminated has had little impact on evaluation designs. One problem is that SPA attempts to reduce reproduction costs have reduced the availability of copies of evaluation reports received for use by the SPA and others. The Evaluation and Monitoring Unit director told us that due to the reduction in the SPA's budget, evaluation reports received would have to be circulated from RPU to RPU in turn; this would involve a good deal of time for reports to be circulated through all eight RPUs.

The acting SPA director indicated that, upon request, copies of evaluation reports are circulated to the requestor. However, there is no periodic newsletter citing the existence of evaluation reports. We were told that the last "Status Report" on evaluation had been compiled in 1973-74 but is not kept current because of a lack of staff and the amount of evaluation activity. Therefore, interested persons or agencies do not know of the existence of completed evaluation studies so they can request them or be aware of the procedures for obtaining evaluation information of interest and possible utility to them.

The SPA informally maintains information on reports of completed evaluations. The SPA Evaluation and Monitoring Unit has been keeping an index file of projects which it is aware of as having been evaluated, which are being evaluated currently, or which are scheduled to be evaluated. However, the unit has no assurance that its file is complete or accurate because it relies on RPUs to voluntarily submit such information. We found that not all evaluation reports are on file with the unit. To obtain the necessary information on the sample of projects we drew to identify completed evaluations, we had to rely primarily on a master project file maintained by the SPA's financial officer.

According to one SPA official, evaluation results are not used to formulate policy and are not considered particularly relevant for planning at the State level because most of the SPA's planning and evaluation activities are decentralized. Furthermore, SPA officials did not know whether evaluation results and recommendations were generally used in the planning process at the RPU level.

### Kansas

The SPA does not rely on the results of formal evaluations in its planning and decisionmaking and, at the time of our review, had no system for disseminating the results and findings of evaluations. For evaluations which had been attempted, involving 11 SPA-funded projects, in only 1 case had the results been made available before the date upon which the decision to continue project funding was made.

One SPA official said that a "self-evaluation," prepared usually by the subgrantee, and completed after the grant is completed, is generally available too late to be used for planning purposes. Another SPA official described these "self-evaluations" as usually only "self-serving."

### California

The SPA had no management system for conducting evaluations and using evaluation results, at the time of our review. The manual information-filing system then being employed could not disseminate evaluation results to requesting parties. Evaluation information that had been received had not yet been incorporated into project files and other evaluation information was available only at the RPU level according to RPU officials. An SPA official said local government and contract evaluators have requested evaluation information on programs and projects, but the SPA had been unable to disseminate the information.

We asked SPA officials how they organize and disseminate accurate and objective evaluation information, to whom it is disseminated, how often, the form in which it is presented, and how recipients have responded to the information. We were told that the SPA did not have a system for disseminating such information.

Previously the SPA had initiated an Evaluation Resource and Reference Service, which was to have been linked to an automated information system and was to have provided:

--A clearinghouse for the dissemination and timely feedback of evaluation results, citing principal findings as well as their strengths and limitations, for use by program administrators, planners, and project staff at all levels.

--Indexing, storage, and retrieval of evaluation information to permit one to examine evaluation results among and between projects which share similar objectives, intervention strategies, target populations or community-crime characteristics, and/or combinations of subelements of each.

This approach to synthesizing evaluation information was modeled on the Databank of Program Evaluation system developed at the University of California at Los Angeles in 1973-75 with support provided by a grant from the Mental Health Services Development Branch, National Institute of Mental Health. For each evaluation report screened as input to the information system, the status of each program or project evaluated is indicated in terms of program outcomes, as well as other project and evaluation information, such as:

--Condition treated.

--Age, sex, race, and income characteristics of the sample population.

--Sample size.

--Site.

--Treatment method.

--Characteristics of the study design.

--What is measured.

--What measures are used.

--How data is collected.

--Conclusions.

A sample printout of a study conducted in the field of health and addiction sciences which was input to this system follows.

## SAMPLE PRINTOUT

Kissin, B., Platz, A. and Su, W.H., "Social and Psychological Factors in the Treatment of Chronic Alcoholism," *Journal of Psychiatric Research*, Volume 8, pp. 13-27, October 1970.

**THE CONDITION:** chronic alcoholism

**THE POPULATION:** SAMPLE SIZE: 458; AGE: approximately 30 percent over 45; SEX: 100 percent male; RACE: no information; INCOME: no information.

**TYPE OF TREATMENT:** 3 comparison groups: group plus adjunctive drug therapy, pharmacotherapy (chlordiazepoxide and imipramine), and inpatient rehabilitation activities.

**SITE:** comparison — hospital inpatient and out-patient

**STUDY DESIGN:** controls, random assignment, before-after measures, statistical tests.

**WHAT IS MEASURED:** (1) addictive behavior

**WHAT MEASURES ARE USED:** abstinence for 6 months

**HOW ARE THE DATA COLLECTED:** interviews

**WHAT IS MEASURED:** (2) social, vocational adjustment

**WHAT MEASURES ARE USED:** no information

**HOW ARE THE DATA COLLECTED:** interviews, rating and observation by psychiatric social worker

**CONCLUSIONS:** "Socially and psychologically stable patients do best in psychotherapy; the socially intact but psychologically less sophisticated patient does better under drug therapy; and, the socially unstable but intellectually intact patient does best on an inpatient rehabilitation program." Overall success rate for all treatments was 18.6 percent; individual success rates were: 4.9 percent for control, 21.2 percent for drug therapy, 35.5 percent for group psychotherapy, and 15.2 percent for rehabilitation.

**PROGRAM ADDRESS:** Division of Alcoholism, Department of Psychiatry, State University of New York, Downstate Medical Center, Brooklyn, New York.

**MODULE REFERENCES**  
(other articles on the same project): (1) Kissin, B. and Platz, A. "The Use of Drugs in the Long Term Rehabilitation of Chronic Alcoholics." In D. H. Efron (ed.), *Psychopharmacology: A Review of Progress 1957-1967*. Public Health Service Publication No. 1836, 1968. (2) Kissin, B., Rosenblatt, S.M. and Machover, S. "Prognostic Factors in Alcoholism." Chapter III *Psychiatric Research Report No. 24*, American Psychiatric Association, 1968.



The information system was designed to facilitate the communication of evaluation findings to provide specific answers, in the form of interpreted data, which provide reasonably conclusive evidence as to which techniques work best, for whom, and under what circumstances.

The results provided to the user would, at a minimum, tell him what has not proven conclusively effective and, more importantly, could help him identify intervention strategies which might.

Further, such a system could communicate current and innovative advances in evaluation methodology, statistical analysis, and application of knowledge in developing criminal justice system planning technology to administrators, managers, and practitioners of evaluation by helping to answer basic evaluation/research questions, such as:

- Which is the most appropriate indicator of program or project success?
- What is the most appropriate outcome measure for each indicator evident in, or suggested or recommended by, the situation?
- How much change in the outcome measure(s) is required to demonstrate that a program is effective?
- What interpretation(s) and conclusion(s) can be made and what actions are recommended?
- To what extent can these findings be extrapolated to fit a larger universe of need and under what conditions?
- Which of several outcome measures are capable of differentiating the proportion of effect which is attributable to each variable?

EVALUATION INFORMATION IS FREQUENTLY  
NOT GENERATED IN TIME FOR USE IN  
DECISIONMAKING AND PLANNING

With the infusion of LEAA funds into criminal justice activities and with competing demands between various programs, there is an increasing need for facts about these programs that should be used in decisionmaking, planning, and policymaking. On national and State levels, program impact

information is needed for making decisions, such as choices between programs and budget levels. On a State and local level, as well as on the national level, comparative outcome information is needed for deciding which intervention strategies work best and for planning, developing, and managing programs.

Any evaluation system must provide for ongoing feedback of evaluation information for planning, program development, program management, decisionmaking, and policymaking.

In three of the four States visited, the evaluation results often were not available to be used at the time decisions were made about project funding or re-funding, nor were they available in time for use in State comprehensive plans or management of program and project activities. In the fourth State (Pennsylvania), evaluation results are generally not available for such purposes until the second or third year of the project.

### Oregon

SPA staff estimated that about 10 percent of the projects had been evaluated and only half were reported in time for re-funding decisions. They believed that the timeliness problem was significant enough that LEAA evaluation guidelines should address it specifically.

### Kansas

For those projects which the SPA indicated evaluations had been attempted, in only one case had the results been available before re-funding decisions were to be made. One SPA official said that even the self-assessments, which are not formal evaluations, are usually prepared by the project directors, most often after the subgrant period has expired. He said that he would like to say that each project director makes a "self-evaluation" at the close of each project, but they do not; since the project is usually completed by the time an evaluation is made, it is too late to be used for planning purposes. As previously noted, such "evaluations" are frequently considered by SPA staff to be "self-serving."

### California

Personnel we contacted in 13 RPUs stated that evaluation information is not received in time for decisions concerning re-funding or possible changes in the scope of projects. They felt that the State requirement that evaluations be received within 90 days after the completion of the project period precluded using evaluation data for decisionmaking.

Of 15 State-identified evaluations for fiscal years 1973-75, only 4 were dated before the end of the project period being evaluated. Four were dated 30 to 90 days following the end of the project period, five were dated later than 90 days after the project, and two did not indicate any completion date.

We were told that before the reorganization in 1975, about 25 percent of the evaluations received were used by the SPA in decisions to re-fund, stop funding, or change the scope of projects. But at the time of our review, the evaluation results were not being made available because an alternative evaluation program had not been established.

### Pennsylvania

In general, SPA evaluation personnel regarded the submission of evaluation reports as timely. However, we learned that final evaluation reports are often issued after they could have been most useful, at the time re-funding decisions are made. In 188 first-, second-, and third-year randomly sampled projects, evaluation information was generated during the project funding period only 27 percent of the time for first-year projects. However, for second- and third-year projects sampled, evaluation results were reported by SPA and RPU officials as being available 89 and 77 percent of the time, respectively.

The SPA's evaluation-reporting procedures in almost all cases request project evaluators to submit four reports:

1. A brief report, filed after the first 3 months, describing initial progress.
2. An interim report, after about 5 months, describing the progress and problems of the evaluation and the project to date.
3. A re-funding report with findings and recommendations, to be submitted when needed for a Regional Planning Council or task force decision concerning continued funding.
4. A brief followup report, at the end of the subgrant period, to update the re-funding report.

RPU staff members are to notify the project evaluator of the dates these reports will be needed. However, since evaluation reports are submitted at intervals during the project

year and are not tied to the development of the State comprehensive plan, written evaluation reports may not be available when needed for planning purposes.

RECOMMENDATION FOR IMPACT EVALUATION  
INFORMATION AND REPORTING SYSTEMS  
HAS NOT BEEN IMPLEMENTED

In a report issued in March 1974, we recommended the establishment of impact information and reporting systems, for use by the States, whereby data could be available on the impact of similar projects. This would help insure that comparable data on similar projects could be collected and would obviate the need for many independent project-by-project evaluations. Yet it would still give project directors (and other groups of evaluation users) information on project results.

None of the four States visited had impact evaluation information systems, nor had LEAA, to facilitate the timely comparison of project results and accomplishments.

LEAA operates an evaluation clearinghouse, but its scope has been limited to published material. Evaluation studies have not usually been included because they were not usually formal publications.

When the clearinghouse was started in January 1975, the original criteria for including an evaluation study were minimal. The initial evaluation reports included in clearinghouse holdings were not judged on the quality of evaluation analysis or data. There was nothing in the system to indicate which studies were well done and which ones were not.

The Assistant Director of what is now the National Institute's Office of Research and Evaluation Methods stated that as the clearinghouse develops, stricter criteria will probably be developed and some studies that are now included may be purged from the file. Although the clearinghouse does disseminate evaluation reports, its lack of quality control procedures lessens the effectiveness of this information for use by decisionmakers.

Oregon

The SPA director told us that the SPA did not have an impact evaluation information system, such as we recommended, in operation or planned. He acknowledged that such a system was desirable and said the SPA would develop one, given adequate resources. Furthermore, he was not aware of any assistance or encouragement from LEAA to develop such a system.

Another SPA staff member told us of attempts to develop impact evaluation results; he cited denial of funding by LEAA for developing follow-on data as part of the evaluation of the Portland High Impact Anti-Crime Program as one reason for failure. He said that without follow-on studies the SPA cannot

- analyze the impact of area-based (within cities) projects on crime,
- analyze the impact of the program on displacing crime to outlying areas, or
- validate or replicate the first of three intended studies to determine whether the outcomes would be the same.

### Pennsylvania

At the time of our review, the SPA's proposal for developing an "information indicator system" was being planned. Therefore, we could not determine whether it would be designed to perform the functions of the impact evaluation information system our recommendation envisioned. However, the chief of the SPA's Evaluation and Monitoring Unit proposed that the information indicator system be designed to organize data on similar types of projects for comparative purposes. When completed, the information indicator system may be linked to a grants management information system, if the program for the grants management information system is modified. At the time of our review, neither system was operationa..

### California

When we asked SPA officials whether they had developed an impact evaluation information system, the SPA director said that evaluation results are the responsibility of local governments, to make funding decisions. However, another SPA official believed in the need for an impact evaluation information system " \* \* \* to be developed in the future." We were informed that such a system had been started previously and was also planned to be linked to an automated grants management information system. At the time of our review, neither system appeared to be operational. In addition, we were told that LEAA had provided no assistance in developing an impact evaluation information system.

The Evaluation Information System which was to have been implemented, prior to the reorganization, was being designed to provide data storage and retrieval capability so that data could be analyzed using the most appropriate statistical techniques. This would have enabled the user to determine the reliability, validity, and applicability of evaluation findings for use in decisionmaking at the policy level and for more accurate and improved criminal justice system planning.

We understood, upon reviewing the plan and information about the previous California Evaluation Program, that the Evaluation Information System described above and the Evaluation Resource and Reference Service, previously noted, were to be linked to permit ready access to (1) evaluation findings on individual and groups of similar projects and (2) the data bases used in assessing project outcomes and relative effectiveness.

### Kansas

At the time of our review, the SPA did not have an evaluation impact information system or plans to establish one.

### SPAs' MANAGEMENT AND PLANNING PROCESSES DO NOT SYSTEMATICALLY INCORPORATE EVALUATION ACTIVITIES AND RESULTS

As a result of the recommendations in the LEAA "Evaluation Policy Task Force Report" of March 1974, guidelines to SPAs set forth three LEAA goals for evaluation which the States are expected to consider in developing their own evaluation strategies.

LEAA's evaluation "management" goal is to have performance information used in planning and decisionmaking functions at each level of the LEAA program to help program managers achieve goals.

The purpose of the management goal is to provide a framework for emphasizing evaluation as a basic management and planning tool. An effective evaluation process, as envisioned by LEAA's evaluation guidelines, is expected to generate information which would be used to:

- Determine the progress and problems in implementing funded projects and to make decisions concerning the provision of management assistance.

- Determine whether present projects and programs should be continued, modified, or terminated.
- Assess the appropriateness of standards, goals, and objectives.
- Provide a basis for planning future projects and programs and for allocating financial and other resources.
- Assess the planning and administrative functions of the SPA.

In addressing LEAA's management goal, the States are expected to "intensely evaluate," either with their own staff or third-party contractors, selected projects or groups of projects according to SPA planning needs. Such "intensive evaluations" are to incorporate sound evaluation methodologies, before project implementation, control groups, independent data collection and analysis, and indepth case studies. To receive block grant moneys each SPA must:

- Indicate the projects or programs to be intensively evaluated, the criteria by which they were chosen, and the resources allocated to this level of evaluation.
- Describe the process in which intensive evaluations are planned and implemented (including the way in which contracted evaluators are selected, if they are used).
- Describe the relationship between intensive evaluation and planning, including:
  1. Procedures for reporting, corroborating, and utilizing evaluation findings in the planning and funding decisions of both the SPA staff and the supervisory board.
  2. Measures taken to insure the independence of the evaluators from the projects, the objectivity and accuracy of the evaluation, and the timely submission of evaluation reports.

Further, each SPA must take into account the results of the National Evaluation Program and its own evaluations, in planning its future activities and in making program decisions. If completed NEP study recommendations are inapplicable to a particular SPA's circumstances, are contradicted by a local evaluation, or cannot be implemented for specific local reasons, an SPA is not bound to follow them but is expected to set forth the specific bases for its decision not to.

In preparing State comprehensive plans, the SPAs must (1) show in detail, in each program area in their plans, the sources of evaluation data which they have consulted in developing the projects and programs proposed, (2) describe how the evaluation data, where such data exist, influence the projects and programs included in the State plans, and (3) indicate how the SPAs disseminate evaluation results and findings.

In the four States visited, we concluded that none had established clear and precise procedures for doing and using evaluations as part of their State comprehensive planning process, and only in Pennsylvania was there evidence that evaluation results were being systematically used in decisionmaking.

### Oregon

The SPA director told us that the SPA cannot give its supervisory board information about the impact of previously funded projects when it meets to review projects for re-funding. When board members ask what the projects have accomplished, the SPA reportedly gives the members subjective data on the level of project activities.

Another SPA official explained the absence of evaluation results being used in comprehensive planning as due to limited funding, restrictive guidelines, and too many deadlines imposed by LEAA; he said these factors prevent the SPA from having the time or resources to devote to analysis and use of evaluation results in comprehensive planning. Other SPA staff members commented on some of the problems which they believed had contributed to the inadequacy of the SPA's block grant evaluation program, as follows:

- SPA management gives inadequate direction and guidance to the block grant evaluation unit as to what is expected.
- There is no consensus on what evaluation should consist of and how evaluation results should be used.



--SPA management places little emphasis on evaluating block grants (projects) and has little commitment for block grant evaluation.

--The block grant evaluation unit is understaffed.

### Pennsylvania

We found little evidence to indicate that evaluation information has had more than a limited impact on planning processes and policy formulation. In general, evaluation information is used primarily as a management tool in making decisions regarding the continuation of Federal funding of projects and to a far lesser extent in planning.

According to one SPA official, evaluation results are not used to formulate policy and are not considered to be particularly relevant for State planning because of the SPA's decentralized organization. The SPA's evaluation and monitoring guidelines state:

"The evaluation and monitoring unit will also be responsible for insuring the incorporation of evaluation results and activities into the comprehensive planning process."

However, neither the SPA evaluation director nor the director of planning for the SPA were aware of how evaluation results and recommendations were used in planning processes, development of plans, and decisionmaking at the PPU level. We were told that evaluation results of State and Federal discretionary projects are used informally by the SPA in developing the State's comprehensive plan.

Under the SPA's decentralized organization, each RPU develops its own comprehensive plan; as a consequence, the eight RPUs develop their plans in eight different ways. Guidelines issued by the SPA to assist the RPUs consist of LEAA guideline manuals and an SPA-prepared document called the "bluebook" which contains forms, schedules, instructions, and requirements for organizing RPU input for use in preparing the overall State plan. The SPA provides no other specific guidance to the RPUs to help them develop their plans. Review of RPU plans submitted is made on a technical basis rather than on quality and normally results in SPA requests for additional information from the RPUs.

An RPU official said evaluation information is considered by RPU personnel in connection with planning decisions, including whether to continue projects or revise

their scope and objectives. However, another RPU official said one of the problems the RPU faced was that the evaluation process was independent of the planning process and that interaction between planners and evaluators was informal. One RPU director stated the biggest problem statewide is the lack of comprehensive planning; he cited the absence of a tangible policy and guidance in the evaluation and planning area from the SPA. Another RPU official said that to be able to use evaluations properly in planning, local governments and the Regional Planning Councils (RPU supervisory bodies) must first be convinced to consider evaluation results and, secondly, be taught how to use them.

Both RPUs were attempting to integrate the evaluation function and the planning function at the RPU level; but it was apparent that evaluations were used only as another source of general information by RPU planners.

In our view, the Pennsylvania SPA is failing to follow its own, as well as LEAA's, guidelines for insuring the incorporation of evaluation results and activities into the comprehensive planning process. Furthermore, the SPA's Evaluation and Monitoring Unit is not coordinating the monitoring and evaluation efforts of RPUs, resulting in little or no statewide coordination of evaluation activities or consistent use of evaluation results in planning and decisionmaking.

### Kansas

The impact of evaluation upon planning and management activities in Kansas was minimal. For 11 projects evaluated, only 1 project evaluation conducted by SPA staff was followed through to completion. Only three evaluation reports had been issued at the time of our review (one covering five projects and two covering one project each). SPA officials indicated difficulties in attempting to establish causal relationships between the project and results obtained. Further, in only one case were evaluation results made available before the re-funding decision was made. The SPA relies on the results of monitoring as a basis for planning improvements and correcting deficiencies in active projects and on the self-assessment performed by the subgrantee in its management and grant-processing system. SPA officials told us that the self-assessment, usually occurring after the grant has been completed, is too late to be used for planning and is usually only "self-serving."

## California

When we asked the SPA director and staff responsible for the comprehensive planning process how the SPA provides for incorporation of evaluation findings and recommendations in the comprehensive planning process, they stated that evaluation results are to serve as decisionmaking tools of local governments for re-funding or terminating projects after LEAA funding. In addition, RPUs are responsible for project monitoring, and the monitoring efforts in the RPUs contacted varied widely. Neither a director nor staff had been hired for an SPA evaluation group at the time of our review, and no documents existed on current SPA planning guidelines, policies, or procedures. We were told that evaluation results either from within the State or NEP had not been consulted or used in preparing the 1976 State comprehensive plan.

### DECISIONS TO DO AND USE EVALUATIONS ARE NOT BASED ON COMPREHENSIVE PLANNING NEEDS

The Congress intended that SPAs be responsible for setting priorities, formulating comprehensive plans, and implementing programs. The SPAs were designated as the permanent decisionmaking and administrative bodies to receive block grant awards from LEAA and to disburse subgrants to local governments. Each SPA must develop, prepare, and update an annual comprehensive plan that must be approved by LEAA before receiving the full block grant. At the time of our review this plan required:

- A description of existing law enforcement and criminal justice systems and resources.
- An analysis of law enforcement and criminal justice needs, problems, and priorities.
- A description of the State's law enforcement and criminal justice standards and goals.
- A multiyear projection of State improvements.
- A description of programs, plans, and systems related to crime, delinquency, and criminal justice.
- A description of annual action programs.
- A report on past progress, which is primarily a description or evaluation of previously funded projects.

--A statement of intent to comply with statutory requirements.

LEAA guideline requirements for evaluation emphasize and direct that the SPA select individual projects or groups of projects to be evaluated based upon comprehensive planning needs.

SPAs are encouraged to use evaluation findings in planning and related funding decisions of both the SPA staff and supervisory boards which involve the allocation of Federal and matching funds by program area. Further, each State must develop a State evaluation strategy which will provide information on the results and impact of the programs or projects it supports through its State comprehensive plan.

However, at the time of our review of SPA and LEAA operations, we could find no published guidelines or document relating the evaluation effort to the planning effort, except what may be inferred from the "Provision for Evaluation" section of the LEAA guideline requirements. Even though LEAA has indicated the need for establishing goals and objectives for evaluations, there was no indication that the objectives set during planning (or which should have been set) were to be the reference points for evaluation.

Evaluation is, or should be, an integral part of the planning process. Viewed in brief, the planning process involves (1) a clear analysis of the problem, (2) an identification of critical points where intervention or remedial action could ameliorate the problem, (3) an identification of the amount and kind of additional resources needed, (4) the formulation of concrete objectives to be attained, (5) the development of project concepts which provide the vehicle for accomplishing program objectives, (6) the provision of controls to assure that project activities relate to the achievement of program objectives, and (7) the design of evaluation procedures (including standards) to assess the success of the program and projects in meeting the objectives. The main thrust of LEAA management in approaching this process is to concentrate on assuring compliance, by the States, with statutory requirements.

In doing this, minimal effort had been made to determine whether the States' comprehensive planning processes use evaluation as a basis for distinguishing what works from that which does not.

A continuing problem experienced by criminal justice system planners is identifying, anticipating, and adequately

planning for the "systemwide effects" (or interaction effect) of federally funded projects and programs on related criminal justice system components. To adequately address these needs, an evaluation system must provide for generating valid and reliable information about the relative effectiveness, crime reduction impact, and system side effects of various intervention strategies actually employed.

In our review of evaluation activities in four States, we could not identify any significant relationship between evaluation and comprehensive planning.

### Oregon

The SPA director said that not enough evaluations have been done to significantly affect the planning process. Another SPA official said the planning process and the State plan are essentially devoid of information from evaluations.

A person responsible for planning activities at the SPA stated that the lack of adequate evaluations put planners in an awkward position, since so little information is available on which strategies work and which do not. Consequently, evaluation information has had minimal impact on planning and decisionmaking.

### California

At the time of our review, the SPA had no management system for conducting and using evaluation results or any program/project monitoring and reporting system to gauge the progress of funded project activities.

### Kansas

The SPA's evaluation efforts have been quite limited. An "assessment process" (consisting of routine processing of grant applications), monitoring, and subgrantee "self-evaluation" reports serve as input to the funding or re-funding decisionmaking process.

Although this "assessment process" may be considered by some to be a form of evaluation, its primary purpose appears to be to assure that applicants for Federal funds have followed SPA procedures in completing the applications. In cases of requests for re-funding, this assessment process appears to be used to determine compliance with previous subgrant provisions contained in this application. The process generally

does not provide information to the full supervisory board of the SPA on the effectiveness of projects and their impact on crime, delinquency, and/or the criminal justice system.

We could find no significant relationship between this process or the use of evaluation information generated, and the State comprehensive planning process.

### Pennsylvania

Because planning and evaluation efforts in Pennsylvania are highly decentralized, the selection of projects to be evaluated and the use of evaluation results in planning, when it occurs, take place at the RPU level. In our view, this type of operation does not provide for comprehensive statewide planning. The RPUs generally determine which projects will be evaluated and decide on the depth of evaluation to be applied. Representatives of the RPUs contacted said evaluation information, when available, is used in making re-funding decisions on specific projects and in the day-to-day management of the projects.

One RPU director said that the separation of evaluation results from the planning process has caused a problem. He also pointed out that if the RPU could obtain tangible policies and guidance from the SPA concerning evaluation and planning, the job would be much easier. Another RPU director believed the entire network, from the SPA through local regional planning councils, suffers from a lack of strong leadership, particularly in planning.

RPU officials could not demonstrate specifically how evaluation information affected the RPU's planning processes. SPA officials responsible for planning and evaluation did not know how evaluation results and information were used by the RPUs in developing their regional plans for input to the State comprehensive plan. Further, RPU personnel could not pinpoint how they use evaluation information in developing their regional plans.

The RPUs contacted indicated that they are attempting to integrate the evaluation function and the planning function at the RPU level. However, at the time of our review, evaluations were apparently used only as general information by the RPU planners. One RPU director said the lack of comprehensive planning is the biggest problem statewide.

The Pennsylvania SPA, in our opinion, is failing to comply with the intent of Federal guidelines and with provisions of the SPA's own evaluation and monitoring guidelines. These

provisions state, in part, that the SPA's Evaluation and Monitoring Unit is responsible for insuring the incorporation of evaluation results and activities into the comprehensive planning process. The SPA does not plan statewide on a comprehensive basis, nor does it conduct or use the results of its evaluation activities on a statewide basis. Decisions concerning the nature and extent of evaluation effort to be carried out, the uses made of evaluative information, and the results obtained are made mainly by the RPUs, not the SPA. The director of the SPA's Evaluation and Monitoring Unit has little control over which projects will be evaluated or the nature and extent of evaluation efforts undertaken at the RPU level.

#### LEAA'S NEP IS NOT TAILORED TO USERS' NEEDS

The objective of LEAA's evaluation "Knowledge Goal" is (1) to obtain and disseminate information on the cost and effectiveness of various approaches to solving crime and criminal justice system problems and (2) to meet the mandate of the Congress.

The results of these evaluations are to be applied nationally and are expected to contribute knowledge concerning what works and what does not. Because of the resources, expertise, and overview required, LEAA's National Institute was given primary responsibility for initiating and coordinating research and evaluation efforts to fulfill this mandate.

However, because current NEP efforts are not tailored to directly meeting users' needs, the use of subsequent information and results in management and planning processes can be hampered. LEAA sees State and local criminal justice personnel as the NEP audience. LEAA is trying to meet planning and policy needs, and the NEP phase I studies are a first step.

The director of a nationally recognized research organization observed that the phase I efforts are structured to determine what has happened so far, as reflected by previous evaluation studies, and what seems to be worthwhile to evaluate, rather than to determine what are the specific users' needs for evaluation information and how to tailor evaluation efforts to meet those needs.

LEAA is not assuring that the information NEP is producing is in a form that will be most useful to the States and localities in meeting their planning and decisionmaking needs.

This point is further illustrated by the limitations in the procedures used to develop phase I topic areas. LEAA sent the States a suggested list of topic areas to rank according to their interests and preferences. They were permitted to add additional topic areas. However, LEAA left it up to the SPAs to obtain input from other criminal justice personnel within their State as to their interests in recommending topic areas for evaluation study. LEAA's survey of the States was intended to solicit information about topic areas of interest, not to identify specific evaluation information needs.

The original plans for NEP, as outlined in LEAA's 1974 "Evaluation Policy Task Force Report," included the formation of an "evaluation coordinating committee," which, among other things, was to have reviewed suggested topic areas for phase I studies. The committee was to have included representatives from LEAA headquarters, regional administrators, SPAs, and experts in criminal justice research. This committee was never formed.

According to an LEAA official, LEAA's survey of SPAs for phase I topic area suggestions is purportedly designed to fill this gap. In addition, LEAA's technical advisor for NEP contacted selected State criminal justice personnel to determine their evaluation information interests. However, the question of evaluation information usage was not addressed. Also those persons contacted were the ones that the technical advisor personally thought were the primary decisionmakers. However, the technical advisor agreed that he could not identify all the relevant decisionmakers in each State and determine their evaluation needs. He acknowledged the need for a coordinating committee as described in the 1974 LEAA "Evaluation Policy Task Force Report."

Even though the States are not included in the actual selection of phase I topic areas and their evaluation information needs have not been systematically addressed, they still are required to be responsive to NEP in their State plans. Specifically, SPAs must:

- Identify candidate projects and programs for evaluation in NEP.
- Cooperate in developing and implementing the evaluation design.
- Provide requested data.
- Monitor the project and the evaluation.



The States are also to act as the liaisons between LEAA's National Institute, NEP evaluators, and the subgrantee and cooperate in the development and implementation of project evaluation designs, even though the States are not consulted in advance. This lack of involvement of the States in the NEP process can adversely affect evaluation planning. As discussed in chapter 4, lack of evaluation planning before project implementation contributes to problems and inadequacies in the evaluation work performed and results obtained. State involvement in LEAA's procedures and processes is important to assure that what is fed back to the States from NEP is of use to them and that they will be able to carry out the NEP activities required of them.

NEP plans also included phase II studies, which are basically continuations of phase I efforts conducted at the national level. Phase I studies provide a state-of-the-art review and contain recommendations for further evaluation and research, as needed, to be obtained through phase II studies. Topics for phase II are selected by a review committee composed of LEAA National Institute officials, and a technical advisor under contract to LEAA for NEP. At the time of our review, the States were not included in phase II selection decisions and LEAA had no plans to directly involve the States in developing future plans for NEP other than annually soliciting suggestions for additional phase I topic areas. LEAA's NEP project director agreed that including the States is an important issue, but stated that there are not enough resources to do this in that NEP is only one small area of effort of LEAA's National Institute.

#### DECISIONMAKERS AND POLICYMAKERS OPERATE IN AN EVALUATION INFORMATION VACUUM

To determine whether evaluation results were provided by LEAA and the States in time to be used by State decision-makers and policymakers, we questioned officials having major responsibilities for criminal justice matters, State budget directors, State legislators, and representatives of State executive branch agencies and the Governor's office. Only 5 percent felt that the evaluation information was provided in time to be of use all the time; 15 percent said it was available most of the time. Another 15 percent of the respondents indicated it was seldom available or not of use, and 35 percent indicated that they did not receive evaluation information from LEAA or their SPAs.

We determined there is a paucity of valid and reliable evaluation information feedback to policymakers and decision-makers on the relative effectiveness, impact, and side effects

of funded programs and projects. Consequently, decisions and policies made at the State and local levels regarding continued Federal funding or assumption of costs of previously funded programs and projects by State or local governments are frequently unaffected by the results of evaluations. In addition, the scope and coverage of resources allocated under the Crime Control Act Program, which may impact upon, or which may produce, potentially counterproductive side effects in other State and local government programs and services, are not adequately addressed in the LEAA and State evaluation strategies we examined.

### Oregon

About 99 percent of the projects considered for continued Federal funding are approved by the SPA supervisory board. The SPA generally cannot respond to board members' requests for evaluation information on the impact of the projects. An SPA official cited only a few cases in which he was aware evaluation results had been used to determine the types of projects that should be continued. When we asked the SPA director whether the current evaluation program meets the evaluation information needs of 14 potential user groups we identified, he said that it did not. These potential groups include:

- The Governor's office.
- The SPA supervisory board.
- SPA staff (including the director).
- RPU supervisory boards.
- RPU directors and staff.
- Local government officials.
- Local criminal justice agency officials.
- State criminal justice agency heads.
- State budget directors.
- State legislatures.
- Subgrantees.
- LEAA's regional offices.

-LEAA's National Institute.

--The Congress.

Other comments we received from SPA, as well as from other State agency officials, indicated specific problems involving inadequacies in the dissemination of evaluation results and the timeliness and the usefulness of evaluation reports. These problems limit the utility of evaluation reports.

### Pennsylvania

The acting director of the SPA acknowledged that, in his opinion, the needs of 5 of the 14 groups above were not being met--the SPA supervisory board, SPA staff, the RPU supervisory board, the RPU staff, and LEAA's National Institute.

We were told by one RPU official that very few decisions to terminate action projects are made because of critical evaluations. Occasionally the RPU supervisory body assesses available information about a project but then approves or disapproves it on its political merits. Another RPU director also indicated many re-funding decisions are made on the basis of political reasons. He said rational decisions based on evaluation results often do not occur because denying re-funding to projects is often not politically expedient. According to one SPA official, projects occasionally are approved regardless of whether they meet their objectives because of political considerations.

### Kansas

The SPA has not implemented a formal evaluation system and, in its planning and decisionmaking, relies primarily on self-assessments prepared by project directors (sub-grantees), the SPA's monitoring process, and a review of sub-grant applications. Its review process generally does not provide evaluation information to the SPA supervisory board on the effectiveness of projects, their relative effectiveness, and impact on crime, delinquency, and the criminal justice system. Recommendations based on the SPA's review and assessment process are not very influential in decisions to re-fund projects. One State official said that the amount of money to fund new projects is limited, and State matching funds (to provide for the non-Federal share of grant awards) are built into the budgets of State agencies for ongoing project activities with the expectation that the SPA will furnish the Federal share. As a result, projects are funded year after year, with little systematic effort to determine their effectiveness using evaluation information.

## California

We were informed that before the 1975 reorganization, about 25 percent of the evaluations received had been used in SPA decisions on project re-funding. But at the time of our review, the SPA had no evaluation program or procedures for incorporating evaluation results in such decisions, or for use in policymaking and planning. RPU personnel contacted said evaluation information is not generally received in time for use in decisions to re-fund projects or to change the scope of new or ongoing projects.

## Other States

As shown in the table on page 107, the majority of the SPAs responding to the 1975 ACIR nationwide survey indicated, for the most part, that SPA-sponsored evaluations had only moderate influence on project re-funding, in ongoing modification of projects, in providing feedback to the planning process, and in developing new funding priorities.

Of over 260 RPUs responding, 25.5 percent rated evaluations sponsored by their RPUs as having a minor influence on assumption of project costs by State and local governments and 13.7 percent stated that such evaluations had no influence at all. As the table on page 108 illustrates, there is wide variation in the extent to which RPU evaluations are perceived to influence project re-funding, ongoing modification of projects, and providing feedback to the planning process.

More than half of the municipalities and counties responding to ACIR's 1975 survey rated SPA and RPU evaluation systems with which they were familiar as having generally moderate, minor, or no influence in their effect on project re-funding decisions and in the ongoing modification of projects made by local governments. Less than half of the responding local governments rated such evaluation systems as having great influence on project re-funding. Less than 25 percent rated them as having great influence on the ongoing modification of projects. See the table on page 109.

## Dissemination of NEP results is not targeted to specific needs of users

LEAA's procedures for disseminating information from NEP phase I studies are not targeted to meeting the specific needs of users. Summaries of phase I studies are distributed

Rating of Influence of SPA Evaluations  
on Decisionmaking and Planning

Area	Level of influence									
	Great Num- ber	Per- cent	Moderate Num- ber	Per- cent	Minor Num- ber	Per- cent	None Num- ber	Per- cent	Total Num- ber	Per- cent
Project re-funding	13	27.7	27	57.4	5	10.6	2	4.3	47	100
Ongoing modification of projects	13	27.7	27	57.4	5	10.6	2	4.3	47	100
Providing feedback to the planning process	17	36.2	22	46.8	7	14.9	1	2.1	47	100
Assumption of project costs by State and local governments	2	4.3	20	42.5	19	40.4	6	12.8	47	100
Developing new funding priorities	3	6.4	23	48.9	16	34.0	5	10.6	47	100

Rating of Influence of RPU Evaluations  
on Decisionmaking and Planning

<u>Area</u>	Level of influence									
	<u>Great</u> <u>Num-</u> <u>ber</u>	<u>Per-</u> <u>cent</u>	<u>Moderate</u> <u>Num-</u> <u>ber</u>	<u>Per-</u> <u>cent</u>	<u>Minor</u> <u>Num-</u> <u>ber</u>	<u>Per-</u> <u>cent</u>	<u>None</u> <u>Num-</u> <u>ber</u>	<u>Per-</u> <u>cent</u>	<u>Total</u> <u>Num-</u> <u>ber</u>	<u>Per-</u> <u>cent</u>
Project re-funding	117	44.3	84	31.8	27	10.2	36	13.6	264	100
Ongoing modification of projects	83	31.4	121	45.8	30	11.4	30	11.4	264	100
Providing feedback to the planning process	119	45.2	98	37.3	26	9.9	20	7.6	263	100
Assumption of project costs by State and local governments	54	20.5	106	40.3	67	25.5	36	13.7	263	100

Local Governments' Rating of

SPA/RPU Evaluation System

<u>Area</u>	Level of influence						
	<u>Great</u>	<u>Moderate</u>	<u>Minor</u>	<u>None</u>	<u>Total</u>	<u>Per-</u>	<u>Per-</u>
	<u>Num-</u>	<u>Num-</u>	<u>Num-</u>	<u>Num-</u>	<u>Num-</u>	<u>cent</u>	<u>cent</u>
	<u>ber</u>	<u>ber</u>	<u>ber</u>	<u>ber</u>	<u>ber</u>	<u>cent</u>	<u>cent</u>
Project re-funding	466	306	223	108	1,103	42.2	9.8
Ongoing modifica- tion of projects	230	403	220	146	999	23.0	14.6
							99.9

primarily to the SPAs and RPU's. Additional distribution is determined by an LEAA review committee for phase I results. LEAA's National Criminal Justice Reference Service's Selective Notification of Information System is sometimes used for distribution purposes, but only to persons who are registered.

Phase I studies include six products plus a summary, described on pages 62 to 63.

1. A paper outlining issues in the topic area.
2. A process flow diagram.
3. A framework that represents a synthesis of the assumptions that underlie the projects.
4. An assessment of what is known about a topic.
5. An evaluation design for a potential phase II study.
6. A model data collection and evaluation design for use in evaluating individual projects.

All phase I study products except number 5, the potential phase II evaluation design, were to be designed for use by LEAA regional office staff, SPAs, RPU's, and criminal justice system personnel. This product was to be designed for use by LEAA headquarters. However, only the published summaries of completed phase I studies are regularly distributed to the States. Information needed to (1) fully replicate projects, such as the evaluation design and (2) make planning decisions based on an assessment of what is known about the relative effectiveness of different approaches is not routinely distributed to the States.

The reason for not distributing all phase I study products to the States, according to an LEAA official, is that the SPA people would not want to go through a voluminous study. However, in the absence of an assessment of specific users' needs before the implementation of a phase I study, such reasoning is at least subject to question. Given the acknowledged limitations of phase I studies, due to a lack of sufficient data and other problems discussed in chapter 4, we question the potential effectiveness, utility, and applicability of NEP in addressing the planning, decisionmaking, and policymaking needs of users at various levels in this intergovernmental program.

A needs assessment, performed before a phase I study begins, would permit better identification of the target



groups of evaluation information users' who could benefit from the resultant products and information.

State and local officials are not satisfied with LEAA and State evaluation efforts and information

Many of the SPA and RPU personnel we contacted expressed concern over, and lack of satisfaction with, their own as well as LEAA's evaluation efforts. Furthermore, our survey of key State decisionmakers and policymakers in six States revealed similar dissatisfaction. When we asked these State officials whether they were satisfied with the evaluation information they were receiving from LEAA and their SPA, 30 percent indicated they did not receive such information and another 22.5 percent reported they were dissatisfied with what they did receive; less than 43 percent were satisfied with what they received.

When asked whether evaluations were timely, only 20 percent indicated that the evaluation information provided was of use "all or most of the time," and another 35 percent indicated they did not receive appropriate information or received none at all.

We also asked these State officials how they or their staff used the results, findings, and information provided to them by formal evaluations of LEAA- or SPA-funded programs and projects. Almost 60 percent indicated they could not use the results of such evaluations in their decisionmaking or did not respond. Less than half of the respondents indicated that they used the results of formal evaluations in planning, and less than 38 percent indicated similar usage of evaluation results in policy formulation.

We asked key State officials in six States to express their opinions of current and/or proposed evaluation programs, policies, procedures, practices, and results of LEAA and their SPAs in meeting their evaluation information needs. Only 15 percent rated LEAA efforts as "frequently" or "completely adequate," and 45 percent rated their SPAs' evaluation efforts as "inadequate" to "very inadequate."

The results of the 1975 ACIR nationwide survey indicated similar views among local government officials concerning the adequacy of SPA and RPU evaluation systems. Of 1,055 responding municipalities and counties, 288 rated the SPA evaluation systems in their State as "poor," and 93 felt that "it should be abolished." Only 5.1 percent of the local governments responding rated the SPAs' evaluation systems as "excellent,"

and 32.2 percent rated them only "fair." Local government officials viewed RPU evaluation systems as being little better; 38.4 percent rated them fair, 19.2 percent rated them poor, and 5 percent indicated that RPU evaluation systems should be abolished.

In a 1975 survey of the nation's 55 largest cities, the National League of Cities and the U.S. Conference of Mayors reported that a majority of those cities responding were dissatisfied with LEAA evaluation programs, suggesting that evaluations have little impact upon, or relevance to, local criminal justice planning. Nearly two-thirds of the respondents characterized LEAA's evaluation programs as poor (42.9 percent) or fair (26.5 percent); six respondents felt that LEAA evaluation programs should be abolished. Some comments from respondents follow.

"The overall program has been poor in terms of guideline requirements and action which would result in the development of a comprehensive evaluation program."

"LEAA is too far removed to evaluate local programs and their evaluations tend to be after the fact."

"Skewed to cover LEAA's backside and accordingly of little value to local units of government."

"I haven't                    ny."

"Too often turn into a waste of manpower and money."

"A myth."

Two-thirds of the respondents indicated similar dissatisfaction with SPA evaluation programs. Fifty-three percent rated SPA evaluation programs as poor; 10 percent indicated they should be abolished. Some comments from the respondents follow.

"To my knowledge, SPA evaluation programs are non-existent."

"The SPA talks a good game, but doesn't produce."

"They have not initiated more than one-half dozen in [the] past five years."

"The SPA constantly stresses better evaluation, but the assistance provided to the City and the example set have been minimal."

## CHAPTER 6

### ALLOCATION AND MANAGEMENT OF

### EVALUATION RESOURCES NEED IMPROVEMENT

Funds and staff allocated by LEAA and the States are inadequate for planning, managing, doing, and effectively using evaluation. Some States have assigned low priority to evaluation programs and activities. Limited availability, inadequate amounts, and restrictions on the use of funds for evaluation are reflected in various management strategies employed by the States for financially supporting evaluation efforts, with each having disadvantages and some advantages depending on the organization of the SPA. In addition, more effective technical/management assistance and training in evaluation is needed.

Organization of evaluation functions in LEAA and the States lacks direction and effective management controls to insure that evaluation results are generated, used, and made relevant to the needs of planners, program/project managers, decisionmakers, and policymakers at all levels in the inter-governmental Crime Control Act Program. Furthermore, the organizational placement of the evaluation function is too far removed from top management to be effective.

Frequent changes in LEAA and SPA administrators and in LEAA guidelines and requirements for evaluation also have caused confusion and difficulties in doing and using evaluations.

Major prerequisites for insuring effective evaluation practices and products are adequate resources and sound organizational management of evaluation functions and personnel in relation to activities of other organizational units. Inadequate concern for the organization and management effectiveness of evaluation responsibilities can lead to failure in critical evaluation tasks, such as:

- Definition of program objectives and measures used to gage progress.
- Development of adequate evaluation studies.
- Dissemination and use of evaluation findings.

Two key questions which must be addressed in such considerations are:

--Who decides what needs to be known about policies, programs, and projects?

--Who has or should be given the responsibility, resources, and authority to carry out the tasks to answer questions of concern to the above group(s)?

Several related factors are important to the success of management systems established to support the planning, design, execution, and use of evaluation results.

--Organizational commitment. The support of the administrative head and executive-level management is vital to the encouragement and survival of evaluation functions and activities.

--Assignment of responsibility and authority. Unless those responsible for evaluation are given sufficient authority to supervise and/or carry out evaluation functions, serious problems may result, including:

1. The inability to recruit, hire, and retain qualified staff and obtain sufficient funding for evaluation.
2. Organizational fragmentation and lack of clear delineation of roles and responsibilities of participating organizational units.
3. Problems of coordinating evaluation tasks and assignments involving personnel competent and capable of carrying them out.

--Allocation of adequate resources. Without adequate funding and staff to support and maintain evaluation functions, activities, and services, evaluation work simply cannot be adequately performed.

Highly qualified evaluation staff and necessary fiscal and supportive services are essential for:

--Adequate definition of program objectives and measures of effectiveness and impact.

--Development of evaluation strategies and work plans.

--Design of evaluation studies and evaluation components of action programs.

--Development of research methodologies.

- Review of proposals.
- Supervision and/or execution of evaluation studies.
- Dissemination of evaluation findings and recommendations.

Others have recognized that not all programs require the same level of funding for evaluation. The amount may vary according to several factors. These may include but would not be limited to the (1) types, sizes, and nature of programs, (2) types of decisions required, (3) way evaluation information is to be used and probability that evaluation findings will be used, and (4) availability, complexity, and data requirements of various methodologies being considered for use in evaluating the impact, relative effectiveness, and cost/efficiency of programs and projects.

#### RESOURCES ALLOCATED FOR EVALUATION ARE INADEQUATE

LEAA and the States have not allocated enough money to establish and maintain an adequate evaluation capability and, in our view, more assistance by LEAA is warranted. Further, the unavailability of qualified evaluation professionals continues to be a problem.

#### LEAA headquarters

Ninety percent of the organizational units within LEAA reported to have evaluation responsibilities and functions cited limitations both internal and external to LEAA as affecting the type, scope, and adequacy of evaluation work that involved their unit. Eighty-three percent of these units cited problems in obtaining or maintaining adequate qualified staff, and 72 percent indicated the amount of funding support provided for evaluation limits the adequacy and scope of evaluation work performed.

Some related resource, management, and technical issues and problems cited by two or more of the headquarters units responding to our survey include:

- Coordination and timing of action program activities and evaluation.
- Complexity and number of different types of action programs.
- LEAA policies.

--Adequacy and availability of expertise.

--Data issues, such as availability and condition of statistical data and project information needed for evaluation purposes.

At the time of our review, LEAA reported that it had committed about \$12.5 million in fiscal year 1976 funds to evaluation activities and 23 staff-years (which represent 4 percent of the 529 professional staff-years available to the Agency as of October 31, 1975). The amount of funds that LEAA reported to be committed to evaluation represents 3 percent of the nonblock funds available for fiscal year 1976. A more detailed breakdown of LEAA's fiscal year 1976 resource commitment to evaluation, by significantly involved organizational units, follows.

LEAA Resources Committed to Evaluation

Fiscal Year 1976

<u>LEAA unit</u>	<u>Professional staff (full-time equivalent)</u>	<u>Funds</u>  (000 omitted)
Total--all units	22.9	\$12,450
Office of Planning and Management	1.0	-
National Institute of Law Enforcement and Criminal Justice: Program evaluation Capacity building Evaluation research National Evaluation Program Dissemination and technology transfer	15.0	6,850
Office of National Priority Programs (note a)	1.0+	(b)
National Criminal Justice Information and Statistics Service: Comprehensive data system cost benefit study Review and assessment of telecommunications planning Evaluation of victimization survey and national crime panel National Criminal Justice Information and Statistics Service assessment	0.6 - - - -	c/200 - - -
Office of Juvenile Justice and Delinquency Prevention	2.0+	5,000
Office of Regional Operations: Regional offices (note d)	- 3.0	(b) -
Office of Operations Support (Training)	0.3	400

a/This office merged with what is now the Office of Criminal Justice Programs after our review.

b/Funds for project evaluation are reportedly included in selected project grants.

c/Activities were not funded from fiscal year 1976 funds but were still being continued with professional staff time allocated.

d/These offices were closed September 30, 1977, and the Office of Regional Operations was renamed the Office of Criminal Justice Programs.



LEAA's March 1974 "Evaluation Policy Task Force Report," commissioned by its then Administrator, recommended about \$36 million, as compared to the \$12.5 million allocated, to support evaluation program initiatives and activities. Thus, the amount of fiscal year 1976 moneys reported as being committed by LEAA to evaluation represented 34.7 percent of the amount recommended by the 1974 task force. A breakdown of the proposed level of funding for evaluation recommended by the 1974 "Evaluation Policy Task Force Report" is shown in the table on page 120.

The adequacy of the funding for evaluation recommended for fiscal year 1976 by the 1974 Evaluation Policy Task Force was predicated on the basis that SPAs would commit at least 3 percent of their fiscal year 1976 parts C and E (corrections) funds they received to evaluation and that LEAA would commit a similar percentage of its Discretionary Program moneys.

Thirty percent of the LEAA officials representing various headquarters units having evaluation responsibilities indicated that it might be beneficial to their units' (and the Agency's) operations to have more specific legislative provisions mandating specified resources for evaluation funding and manpower. An additional 25 percent of these officials did not respond or indicated such provisions did not apply to their units.

Forty percent of the LEAA officials questioned thought that a specific percentage or amount of funds should be allocated for evaluation purposes, while another 50 percent prefer to see an evaluation component as part of all LEAA-funded activities. Five LEAA officials recommended a specific percentage be set agencywide; the amounts suggested averaged 13 percent of the amount of nonblock funds available to LEAA.

Less than half (9) of the LEAA officials from 20 headquarters organizational units having evaluation responsibilities indicated that the amount of fiscal year 1976 funds allocated for evaluation purposes were sufficient to support their units' evaluation functions, activities, and services. Yet only one official indicated that he had made his need for additional evaluation funding known to the LEAA Administrator.

#### LEAA's National Evaluation Program

The original commitment to NEP, projected at its inception, has not been met. The LEAA "Evaluation Policy Task Force Report" stated that under the Knowledge Program both

Funding for Evaluation--Fiscal Year 1976:

Recommended by LEAA Evaluation Policy

Task Force, March 1974

<u>Evaluation goal/activity</u>	<u>FY 1976 funding recommended</u>
	(000 omitted)
<b>Knowledge Program:</b>	
Major evaluation studies (\$13,600,000):	
Phase I (20 studies @ \$70,000 = \$1,400,000)	\$ 1,400
Phase II (10 studies @ \$500,000 = \$5,000,000)	5,000
Modification of programs to permit evaluation (5 studies @ \$1,200,000 = \$6,000,000)	6,000
Evaluation of project replications (4 replications @ \$300,000 = \$1,200,000)	1,200
<b>Management Program:</b>	
Expected SPA evaluation effort at 3 percent of parts B, C, and E moneys	13,800
Evaluation of national LEAA programs (Discretionary Grant Program @ 3 percent of funds)	4,200
<b>Development Program:</b>	
Model criminal justice system agency evaluation units	500
Model SPA evaluation units	1,000
Innovative evaluation systems, advanced tools, and methodologies	1,900
Model evaluation of Discretionary Grant Program (regional offices) 6-10 studies	300
Training workshops	100
Summer evaluation institutes	100
Technical assistance/SPA coordination	500
<b>Total</b>	<u><u>\$36,000</u></u>

NEP phase I and phase II studies will be performed. (NEP and its approach are more fully described in chs. 2 to 5.) In fiscal year 1974, \$840,000 was to have been spent on phase I studies; this amount was to have increased to \$1,400,000 in fiscal year 1975, and the same amount was to have been allocated in fiscal year 1976. Phase II studies were to begin in fiscal year 1975; 10 studies were planned for fiscal years 1975 and 1976 at \$500,000 each, for a total of \$5,000,000 each year. The total commitment to NEP recommended by the task force for fiscal years 1974-76 was to have been \$13,640,000.

As of October 1977, 27 phase I grants had been awarded, representing just over \$2.8 million, which is about one-quarter of the original recommended amount. No phase II grants had been awarded at the time of our review, and none have since been completed. Since phase I studies are not evaluations but are evaluability assessments and no phase II evaluations have been completed, not only has LEAA's monetary commitment to NEP represented significantly less than the original projection, but their progress in furthering the knowledge goal, as outlined in LEAA's 1974 "Evaluation Policy Task Force Report," is subject to question.

NEP has experienced problems both in obtaining qualified grantees to carry out phase I studies and in managing the program at the national level.

Staffing for NEP within LEAA's National Institute has also been cited as a problem. The responsibility for NEP was originally assigned to the Office of Evaluation in the National Institute, but was moved to the Institute's Office of Research Programs due to insufficient staff in the Office of Evaluation. LEAA officials felt that the National Institute's Office of Research Programs would have more staff to assign to the effort. A technical advisor under the contract with the National Institute had originally recommended that three to four full-time LEAA staff members be assigned to the program. At the time of our review, no one person spent all of his/her time on NEP. About 2 staff-years were being spent on NEP by several different LEAA staff members.

The lack of adequate technical staff assigned to work on NEP has affected the development of phase I efforts in terms of selecting and defining topic areas. This could adversely affect future NEP efforts. Initially, the concept for a "phased approach" to evaluation called for a preliminary step before the start of a phase I study. This was to consist of selecting and defining topic areas and identifying

the projects involved. These preimplementation efforts have been described as phase 0 by the grantee retained to provide technical advice and assistance to LEAA on NEP. However, these evaluation planning efforts were not included in LEAA's initial approach. National Institute staff were initially expected to obtain and prepare this type of information and provide it to those who would actually conduct the phase I studies under a separate grant from LEAA. This has not been done due to the (1) lack of available data, (2) problems in defining mutually exclusive topic areas, and (3) lack of LEAA staff time committed to the effort. Therefore, phase I grantees are expected to develop and prepare this information on their own, even though the initial design and amount of resources envisioned for phase I studies did not anticipate the performance of such basic evaluation planning tasks as part of the work to be done by those actually performing phase I assessments. This may be partly responsible for the questionable quality of phase I efforts to date.

The lack of staff commitment, if continued, could also affect the impact of additional NEP efforts which depend on an adequate analysis of previous evaluation work. Each of the six products, plus the summary, of phase I studies must be reviewed by the National Institute's Office of Research Programs. A determination is then made about further research and appropriate dissemination, based on the implications of completed phase I studies. This workload was expected to increase as NEP progressed and phase II studies began.

A recent report of LEAA's Evaluation Policy Working Group (see ch. 2), cited the problem of insufficient staff for NEP. The group stated that it was not clear whether the number of LEAA staff assigned to NEP would be sufficient to assess, absorb, and disseminate all the knowledge acquired or whether these same staff could design, develop, and manage more than a very few phase II studies.

#### LEAA regional offices 1/

Some regional office officials also cited evaluation staffing problems in the context of carrying out their evaluation responsibilities and in overseeing SPA evaluation efforts. One LEAA regional office planner/evaluator said that LEAA has not adequately addressed problems of assuring

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1/The 10 regional offices were closed September 30, 1977, subsequent to our review.

that adequate funds are allocated to the States for evaluation and that SPAs are sufficiently motivated to use available funds in carrying out its evaluation responsibilities. He said he was aware of no LEAA-planned program to meet evaluation funding needs in the future.

### States and localities

A nationally recognized research organization in the crime and delinquency field has stated that to do meaningful program evaluation, the costs range from 15 to 25 percent of project budgets when evaluation is done on a project-by-project basis. Yet three of the four States we visited allocated 1 percent or less of their available fiscal year 1975 LEAA funds to evaluation. From data obtained in the 1975 ACIR national survey, we calculated that the 55 SPAs collectively allocated, for evaluation purposes, six-tenths of 1 percent of the total LEAA funds available to them. State officials in three of the four States in which we conducted our review indicated that the amount of funds available to them under part B of the 1973 Crime Control Act to plan, design, and carry out evaluations has been totally inadequate. An LEAA regional office official agreed that part B planning funds are not sufficient in most States to adequately meet both LEAA's evaluation and planning requirements.

In fact, many States view the amount of funds available as inadequate to carry out their planning responsibilities. Of those SPAs responding to the 1975 ACIR nationwide survey, 70 percent rated the amount of part B funds to carry out their planning responsibilities as inadequate. Sixty-two percent of the SPAs responding also rated such funding as inadequate for carrying out planning responsibilities at the RPU level, and 66 percent cited part B funds as inadequate to carry out local government planning responsibilities.

In addition, of 337 RPUs responding, 240 (71 percent) rated part B funds as inadequate to carry out their assigned criminal justice planning responsibilities. Fifty-four percent of the 996 municipalities and counties responding rated part B funding as inadequate to carry out criminal justice planning responsibilities in their jurisdictions. Of those SPAs rating part B funds as inadequate, 70 percent indicated that the lack of funds "greatly" hampers SPA evaluation functions and responsibilities. Only one SPA reported the amount of part B funding as "not at all" hampering its evaluation effort.

When asked whether their staff and other resources available to carry out the evaluation responsibilities outlined in their overall evaluation strategies were adequate, only half of the SPAs responding felt they were. And 57 percent of the SPAs responding indicated staff and other resources to carry out monitoring and program evaluation at the RPU level did not appear adequate. Sixty-three percent of the RPUs responding indicated that their staff and other resources were not adequate to carry out their role in project monitoring and evaluation.

#### SOME STATES ASSIGN LOW PRIORITY TO EVALUATION EFFORTS

Three of the four States visited (Oregon, Kansas, and California) have assigned low priority to evaluation efforts.

In all four States visited, we found problems associated with the allocation of sufficient resources to plan, design, and execute (or supervise and manage the execution of) evaluations and in disseminating and incorporating evaluation results in planning, decisionmaking, and policymaking.

#### Oregon

The SPA director stated that part B funds are simply not sufficient to do planning, let alone the added expense of evaluation. Although planning funds for the SPA had increased somewhat up to 1975, such increases do not adequately compensate for inflation and increasingly restrictive LEAA planning and evaluation guideline requirements. The director views such guidelines as ridiculous in light of current available funding. Several SPA staff members stated that evaluation funding was inadequate. They cited insufficient staffing of the SPA's block grant evaluation unit and the absence of evaluation funding as preventing the SPA from complying with LEAA evaluation guideline requirements and precluding the SPA from doing program-level and outcome evaluations. At the time of our review, only one person was officially allocated to the Oregon SPA's block grant evaluation unit, although three positions had been authorized.

Other SPA personnel in Oregon emphasized the need for additional evaluation staff and cited their inability to effectively coordinate and direct evaluation activities, including the review of the adequacy of project objectives and evaluation components, which is important to assure that

projects can be evaluated. SPA staff cited two examples in which efforts to do a program-level impact evaluation and to develop and implement standard evaluation designs involving similar projects had collapsed for lack of sufficient SPA evaluation personnel.

The SPA director's attempts to seek additional funding from the SPA supervisory board from part C (action) moneys to develop an adequate evaluation program failed. This was partly due to confusion over interpretations of the role, and limitations in the use of, part C funds for evaluation purposes and a lack of support and demand for evaluation by the SPA supervisory board. The SPA director related the following events in explaining the problem.

In August 1975 the SPA made a proposal to the executive committee of the Oregon Law Enforcement Council (SPA supervisory board) for part C (action) funds to strengthen the evaluation capabilities of the SPA. However, the council did not act on the proposal, requesting more information and deciding to take the matter up "at a later date." In the interim, the council obligated the available funds for other purposes, leaving no part C money available until approximately January 1977. Although the chairman of the SPA supervisory board stated that council members were convinced by the SPA's presentation that something needed to be done, he cited the following reasons for the council's lack of action:

- Uncertainty regarding LEAA's position on the legality of using part C funds to strengthen SPA evaluation capability.
- The newness of council members and lack of understanding of evaluation.
- Council members' uncertainty as to what needed to be done and wanting additional information and further discussion.

The SPA director said that the SPA would seek additional funding sources in order to develop an adequate evaluation program and strengthen its in-house evaluation capability. He stated that an additional \$140,000 was needed.

Shortly after our contact with LEAA regional office officials, the SPA received a letter from the LEAA regional office announcing the availability of discretionary funds to improve the SPAs' capacity to perform critical functions not currently properly addressed due to a lack of funds.

Grants between \$30,000 and \$66,000 were to be considered by LEAA in any one of five areas, among them evaluation procedures. At the conclusion of our fieldwork, the SPA was drafting an application for a discretionary grant to address what the SPA considered its most pressing problem--evaluation. The 1-year grant would provide "seed money," according to the Oregon SPA director, to get the evaluation effort going. However, even if LEAA granted the maximum amount (\$66,000) it would still leave the SPA \$74,000 short of its stated need. In addition, the director hoped to use part C moneys to carry on the evaluation program after the LEAA discretionary grant expired. The decision over the use of such part C funds for evaluation, at that time, probably rested with the SPA supervisory board as well. The outcome was very questionable.

### Pennsylvania

The SPA has received a \$261,162, 2-year grant under LEAA's Model Evaluation Program to improve the SPA's evaluation capability. But the decentralized nature of the State's evaluation activities and efforts and its project-by-project approach to evaluation fragment the allocation of funding for evaluation and contribute to some of the problems in the quality, quantity, and utility of evaluation results noted in preceding chapters. Further, SPA efforts to organize and maintain up-to-date information regarding completed evaluation studies have been curtailed due to lack of staff and the amount of evaluation activities. The SPA evaluation director recommended changes in the use of LEAA funds to increase the SPA's evaluation capacity to (1) allow the use of a greater proportion of available funds for planning, even at the expense of reducing available "action" funds and (2) permit greater flexibility in the use of such funds to provide for "independent" evaluations.

### Kansas

The SPA, in commenting on past efforts, referred to staffing problems and the need for additional evaluation expertise as contributing to its inability to establish conclusive evaluation results. We were told that LEAA had not furnished financial assistance to the SPA to help support its evaluation effort. The SPA stated the need for funding and additional staff to develop and maintain an evaluation capacity. It cited inadequate staffing as the SPA's most critical problem in evaluation. Without financial aid from LEAA, the



SPA's evaluation director feels the possibility of implementing a sound program is remote. Further, at the close of our visit with the SPA, there was a possibility of a 50-percent agencywide reduction in the staff. Such a reduction would affect evaluation personnel as well as other key staff and could further reduce the possibility of establishing a viable and effective program evaluation system.

## California

As pointed out in preceding chapters, the SPA terminated its previous statewide evaluation program effort and, at the time of our review had not established an evaluation program, hired evaluation staff, or allocated sufficient resources to maintain an adequate evaluation capability. The SPA anticipates meeting as many LEAA requirements as possible with part B moneys, but maintains that the part B moneys are intended for planning purposes and are not sufficient to maintain a large planning, evaluation, and administrative staff at the State level. California received about \$5 million in part B funds for fiscal year 1976. Confusion, similar to that which existed in Oregon, also exists on the part of the present administration in California over the use of parts C and E funds for evaluation purposes.

According to the SPA director, subgrantees will not be allowed to set aside large sums of grant money to meet their responsibility for conducting an "internal assessment" of project results and accomplishments, which is required by LEAA. Further, the SPA staff will not be large enough to help subgrantees meet this requirement. The SPA director stated his view that for LEAA to force an increase in staff, less money would be available as "action money" at the project level.

As shown on page 31, LEAA concluded that the SPA had not allocated sufficient funds and staff to maintain an adequate evaluation capability.

## ADVANTAGES AND DISADVANTAGES OF CURRENT STRATEGIES FOR FUNDING EVALUATION

The Crime Control Act provides for the use of parts C and E (action) and part B (planning) funds by LEAA and the States for evaluation purposes. A ruling by LEAA's General Counsel reinforces this interpretation and, in fact, stated that such usage is expected. Yet our audit indicates that confusion and difficulties still exist among the States

in using part C funds for evaluation. Several State officials said that some State and local policymakers and decisionmakers believe that part C funds should not be used to support administrative costs, which they assume to include evaluation functions and activities. In addition, officials indicated they had experienced difficulties in attempting to allocate and use part C funds for evaluation on other than a project-by-project basis.

Legislative and administrative provisions mandating the passthrough of part C funds to local governments and the necessity of hard-cash match by localities have limited the States' flexibility to use part C funds for evaluation, other than on a subgrant-by-subgrant basis. This approach involves building in a portion of funds for evaluation as part of each individual subgrant.

A recent publication distributed to all SPAs by LEAA to provide guidance and assistance in developing their evaluation programs and activities accurately summarizes this problem.

"Intensive evaluations are expensive and must compete for resource previously committed to action grants or planning activities. The problem is compounded by restrictive funding categories established by Federal regulations and State policies, by existing obligations of most SPA funds to independent subgrants, and by the requirements for matching funds."

Because of the limitations associated with the availability, amount, and methods of financing evaluations, States have used various strategies to fund their evaluation efforts. Each strategy outlined in the following paragraphs is presented with its reported advantages and disadvantages.

1. Part B (planning/administrative) funds.  
Advantage: Increased management control by the SPA; the evaluation unit is a relatively permanent, and stable element within the SPA organization. Disadvantage: A limited amount of part B money is available to support evaluation functions, program activities, and procedures.
2. Part C (action) funds awarded by the SPA to establish "in-house" capability staffed by full-time employees. Advantage: Generally improved quality control over the planning, design, and execution of evaluation studies and

- evaluation results. Disadvantages: Limitation on continued funding and difficulties associated with funding restrictions on the number of SPA staff positions due to the generally higher salary levels required.
3. Part C (action) funds awarded by the SPA to itself to obtain contractors and/or consultants to perform evaluation studies on a cluster or program-level basis on behalf of the SPA. Advantages: Increased resources under SPA staff control and flexible and timely response to meet new or additional evaluation needs and requirements. Disadvantages: Limitation on continuation funding and related restrictions on the use of action grant funds related to contract personnel.
  4. Part C (action) grants to conduct evaluation studies on a selective basis. Advantage: Administration of individual evaluation grants is simplified with the feasibility of concentration of funds in separate grants. Disadvantages: Loss of direct management and quality control over evaluations and difficulty in obtaining matching funds from State and/or local sources.
  5. Set-aside of a portion of individual subgrant awards (part C) to support costs of evaluation on a project-by-project basis. Advantage; Complexity of funding evaluation is reduced. Disadvantages: Evaluation funds made available are often insufficient to permit intensive evaluation of cause and effect relationships, cluster and program-level evaluations are difficult if not impossible to set up, and the evaluation capability of subgrantees is frequently limited. (See pp. 44 to 46 for additional information on the disadvantages of the project-by-project approach to evaluation.)
  6. Set-aside of a portion of subgrant award (part C) with matching funds provided by other subgrantees implementing similar projects. Advantage: The scope or coverage

of the evaluation may be increased to cover more than one project. Disadvantage: Noncomparability of projects may preclude the use of the same evaluation design and related measures, methodology, and data collection procedures for all the involved projects even though they may be in geographic proximity and/or appear to be programmatically related.

These strategies could also be employed in combinations by the SPA in conjunction with RPUs, State agencies, local governments, and subgrantees. However, each method has disadvantages which may affect the quantity, quality, and utility of evaluation information generated.

In our view a more permanent and sufficient method of funding evaluation program activities is warranted to overcome the obstacles, problems, and inadequacies noted in this and preceding chapters.

#### MORE EFFECTIVE EVALUATION TECHNICAL ASSISTANCE AND TRAINING IS NEEDED

Three of the four States visited need more effective training and coordinated technical assistance in making and using evaluations.

#### Training

LEAA officials indicated that there was much more going on in the area of evaluation training as compared to 2 years earlier. They cited the development of a 1-week training course for evaluators and other evaluation seminars and conferences.

Some of the SPA and RPU officials indicated concern for adequate training in planning, designing, developing, implementing, and using evaluation.

However, the planner/evaluator in one of LEAA's regional offices explained that despite such evaluation training initiatives, more needs to be done to assure that qualified evaluation personnel are available to do evaluations and that the users of evaluation reports understand the uses and benefits, as well as the limitations of, current evaluations. According to an LEAA official, many States do not have personnel with adequate evaluation background and skills and short-

term training of these people will not significantly affect their ability to carry out good evaluations. In addition, he said many potential users of data both mistrust evaluation reports and do not sufficiently understand evaluations. He recommended that LEAA and the States develop workshops for potential evaluation users.

LEAA officials responsible for training activities also believe States need more funds to increase SPA/RPU staffing capabilities for planning and evaluation. We agree that this is a necessary first step. Staff and resource commitment to evaluation, the development of an evaluation strategy, and the establishment of a proper organizational framework in which evaluation may take place are factors which must be anticipated in setting prerequisites for an effective evaluation-training program.

None of the four States visited had evaluation training programs for SPA, RPU, local government, or criminal justice agency personnel, although California had tried to establish one before the 1975 reorganization.

#### Technical assistance

As one of five strategies to improve SPA evaluation capability under the "Development Program," LEAA has approached technical assistance to the States in 2 ways: through the 10 LEAA planner/evaluators in the regional offices and by a private contractor. 1/ The other four strategies include training, guidelines, model evaluation demonstrations, and information dissemination.

When the review began, the Technical Assistance Program was assigned to the National Institute's Office of Evaluation. It was to oversee the identification of technical assistance teams, develop evaluation technical assistance resources, and coordinate all evaluation technical assistance. Later, however, the LEAA Evaluation Policy Working Group recommended shifting these responsibilities to what is now the Office of Criminal Justice Programs when it was prepared and staffed to assume the responsibility.

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1/As previously noted, these offices were closed, thus terminating the regional office planner/evaluators function September 30, 1977.

LEAA's 1974 Evaluation Policy Task Force, in setting the blueprint for this effort, recognized the insufficiency of training programs to meet the development goal of LEAA's evaluation policy and stated that "one-to-one" assistance would be required in helping States and localities incorporate evaluation into their management systems. As envisioned by the task force, a technical assistance team was to be established with total responsibility for providing concentrated assistance. Team members would be available for "extended periods of time," for example, up to 3 weeks.

The LEAA Evaluation Policy Task Force members stated concern for the adequacy of previous technical assistance efforts in their March 1, 1974, report to the LEAA Administrator.

"Technical assistance in the past has focused upon one or two days [sic] visits in which the consultant spends most of his time learning about the agency and then takes an hour or so to give general advice available from any textbook on the subject."

In our contact with LEAA and State officials, we found that, in general, most planner/evaluators assigned to LEAA regional offices were probably willing to provide technical assistance in evaluation but were either understaffed, over-committed, or unable to meet particular evaluation needs of SPAs. One LEAA regional office planner/evaluator explained that he had the primary responsibility for assuring that the SPAs in his region receive adequate evaluation technical assistance. But he had been able to spend only 40 percent of his time on evaluation and needed an additional person for planning and evaluation functions.

An SPA (Oregon) director said he had been aware of technical assistance that had been available through the LEAA regional office to help the SPA develop an evaluation program; however, he cited inadequate funding as preventing the SPA from making more than little use of technical assistance that had been available. An SPA staff member in Pennsylvania seemed satisfied with the LEAA regional office planner/evaluator's efforts to assist the SPA.

SPA officials in another State indicated their frustration with the requirements of and assistance provided by the regional office, citing a lack of defined authority on the part of the LEAA regional office to define and distinguish between monitoring, evaluation, and intensive evaluation.

Further, this regional office has accepted the mere statements of intent by the SPA in its evaluation plans as evidence of compliance with LEAA evaluation requirements.

In yet another regional office, officials told us that since the California SPA was not adequately meeting LEAA requirements for the "management" and "development" evaluation goals, the regional office was planning to contract with a university to supply technical assistance directly to RPUs as well as the SPA.

ACIR's 1975 nationwide survey indicated that 62 percent of the responding SPA officials rated technical assistance provided by the LEAA regional offices as only "moderately helpful." An additional 10 percent of the respondents indicated it was "not at all helpful." Further, 27.8 percent of the respondents believed regional offices have not anticipated or taken into account State differences in providing technical assistance.

A private nonprofit organization received a \$336,000 grant from LEAA, a portion of which (about \$56,000) was allocated for providing evaluation technical assistance to SPAs for the period April 1975 through the end of 1976. We were told that such assistance was originally allocated a total of 5 staff-months, but this was amended to 10 staff-months. Grantee staff were not permanently assigned to such efforts but rather responded to requests for technical assistance when they were received. Further, the allocation of staff time was not based on an assessment of SPA technical assistance needs and involved the allotment of 1 staff-month for all the States in each of the 10 LEAA regions. At the time of our review, between 50 and 75 percent of the staff time allocated to this task had been used. Six or seven people were involved at different times. The technical assistance provided was geared to management and administration, rather than to how to do specific evaluations. Technical assistance in evaluation was based on existing organizational constraints and was rendered on a reactive rather than on an anticipatory basis.

Requests for technical assistance typically came from the SPA through the LEAA regional office planner/evaluator who verified the need for technical assistance. The requests eventually reach the grantee who is to provide technical assistance, subsequent to final approval by LEAA's National Institute. Because of this screening process, the grantee providing such technical assistance might not have been aware of every request. We were told that the average time spent in providing technical assistance was 6 days; 3 days spent offsite in preparation and 3 days spent onsite

visitation. Some requests were handled by phone and by mail. At the time of our review, 17 States had received technical assistance through one or more of the above methods. Four of the States were serviced by a workshop held at an LEAA regional office, and 10 participated in LEAA's Model Evaluation Program.

An LEAA grantee providing technical assistance estimated that if the LEAA regional office planner/evaluators could have devoted 50 percent of their time to providing technical assistance in evaluation, SPA management-related assistance could have been more adequately met. We were informed that if the States were forced to comply with LEAA evaluation requirements, the number of technical assistance requests might increase 500 percent if the real needs of the States were identified. However, one LEAA official said that he was not aware of any planned LEAA program that could provide an adequate level of evaluation technical assistance to the States.

Of the States visited only Pennsylvania had the capability which would have permitted them to provide more than limited technical assistance in evaluation to RPUs, localities, and subgrantees. Before the reorganization in 1975, the California SPA had established an evaluation technical assistance and support program, allocating \$500,000 to this effort. But at the time of our review, this program had been terminated.

Of 1,014 municipalities and counties responding to ACIR's nationwide survey, half rated the evaluation technical assistance they received from the SPA as either "inadequate" or nonexistent. Forty-two percent of the respondents rated the quality of RPU technical assistance in evaluation as inadequate or nonexistent.

#### ORGANIZATION OF EVALUATION FUNCTIONS LACKS DIRECTION AND EFFECTIVE MANAGEMENT CONTROLS

Many tasks confront program administrators, as well as managers of evaluation functions and activities, which require effective organization and sound management, if evaluation results are to be generated, used, and made relevant to the needs of planners, program/project managers, decisionmakers, and policymakers. Such tasks include:

- Planning and preparing programs and projects to insure they can be evaluated.



- Developing an evaluation strategy and approach which will permit time to adequately develop the necessary design for evaluation.
- Selecting the most cost-effective method for executing evaluation studies.
- Providing for optimum use and dissemination of evaluation results.
- Effectively managing resources and staff and insuring necessary coordination among various agencies and at different government levels involved in evaluation activities, either directly or indirectly.

### LEAA headquarters

Twenty organizational units identifying themselves as having evaluation responsibilities reported to 12 different office and division heads regarding evaluation matters. Three-fourths of the 118 professionals devoting some fraction of their time to evaluation reportedly spent 50 percent or less of their time on evaluation in fiscal year 1975. Although LEAA reportedly committed or was going to commit about 23 staff-years to evaluation in fiscal year 1976 (4 percent of the professional staff-years available), an additional 93 staff-years were anticipated to be made available through grants or contracts to assist in carrying out evaluation responsibilities during fiscal year 1976.

To determine how evaluations are conducted, we asked LEAA headquarters units for information on (1) the number of evaluations conducted and (2) the method by which such evaluations are carried out. The methods used and the number of evaluations, involving fiscal year 1975 funds and time frames, varied significantly, as follows:

## Methods of Conducting Evaluations

### LEAA Headquarters

<u>Method</u>	<u>Evaluations</u>	
	<u>Number</u>	<u>Percent</u>
In-house by LEAA staff of single organizational unit	86	16.7
In-house by LEAA staff involving more than one organizational unit	12	2.3
Combination of in-house LEAA staff and the grantee (note a)	209	40.7
Grantee only	57	11.1
Grantee and a contracted third party	47	9.1
Combination of in-house LEAA staff, the grantee, and a contracted third party	14	2.7
In-house LEAA staff and a contracted third party	8	1.6
Third-party contractor only	<u>81</u>	<u>15.8</u>
Total	<u>514</u>	<u>100.0</u>

a/Twenty-five evaluations conducted by this method involved a separate grantee to perform the evaluations for other grantees.

A combination of in-house staff and the grantee was the method most frequently used (40.7 percent); 25 of these involved an evaluator selected to perform the evaluation in conjunction with other grantees.

We recognize that in obtaining responses from separate organizational units within LEAA, we could possibly observe some diversity in methods of providing for the conduct of evaluation. However, the significant widespread variation in the manner and methods by which evaluation efforts were conducted may be causing problems which affect the management and use of the evaluation work done.

LEAA headquarters personnel cited difficulty in being able to monitor agreements and in expanding evaluation program activities to an acceptable level. They said staffing problems limit the accomplishment of extensive evaluation work and validation of evaluation results. Difficulties in achieving coordination between the primary LEAA evaluation unit and other LEAA organizational units responsible for the action programs which are being evaluated were also cited.

Such diverse methods may present problems when attempting to incorporate cumulatively the results of such evaluations and yet retain some confidence in their comparability, reliability, and validity for use in planning, decisionmaking, and policymaking.

Further, 65 percent of the headquarters units involved did not have established evaluation standards and reporting formats. Only half indicated having a process and procedures for determining the reliability and validity of evaluation information, data, its interpretation, and conclusions for evaluation work generated or sponsored by them.

Of the 20 headquarters units reported to have an evaluation function, 18 indicated they have or maintain necessary contact with at least 1 other level of the LEAA program's intergovernmental network (identified in the table below), relative to carrying out their evaluation responsibilities. However, the data indicate that fewer LEAA headquarters units maintain contact at the RPU and local levels, respectively.

Contact With Other Units, Organizations,  
and Governmental Levels  
Concerning Evaluation Responsibilities

Unit organizations or governmental level <u>contacted</u>	Headquarters units having contact	
	<u>Number</u>	<u>Percent</u>
LEAA regional office	17	85
SPAs (State government)	11	55
RPUs	7	35
Local planning units	6	30
Local governments	8	40
Universities	12	60
Private and/or public agencies	13	65

Eleven of the 20 units indicated they have the authority to establish, review, modify, or waive LEAA evaluation policies; 1 unit reported it does not maintain contact with other agencies and governmental units relative to its evaluation responsibilities.

Given (1) the nature of the Crime Control Act Program, (2) the necessary involvement of a variety of decisionmakers and policymakers at different governmental levels, and (3) the complexity of intergovernmental relationships which are apparently being, or have been, established relative to evaluation responsibilities carried out, we question the efficiency of LEAA's organizational and management structure to supervise, review, and carry out its evaluation functions, program activities, services, and related administrative processes.

Some LEAA officials have also indicated that they believe some benefit would be derived by having specific legislative provisions which mandate the organizational placement of evaluation responsibilities and activities within the agency.

#### LEAA regional offices

In two LEAA regional offices, LEAA officials apparently had spent little effort ascertaining the extent to which SPAs' evaluation processes and practices are in fact conducted and are accomplishing the objectives set forth by the SPAs in their State plans. One reason advanced for this situation was that the number of regional office staff was not sufficient to allow for the monitoring of State practices.

#### States

LEAA and the States have had various experiences with different organizational approaches to doing and using evaluation, using both in-house personnel and "outside" contractors and/or consultants.

Generally SPAs have tried five types of approaches:

- SPA staff design and execute evaluations.
- SPA contracts with outside third parties for designing and executing evaluations.
- SPA staff prepare the evaluation design and the execution of the evaluation is performed by contractors and/or consultants.

--RPU's and/or the localities design evaluations to be performed by consultants and/or contractors, sometimes subject to SPA approval.

--Subgrantees prepare their own evaluation designs and either contract with third parties or execute the evaluations themselves.

Of course there are any number of variations in the above approaches. These are most often dictated by (1) the nature, type, and number of evaluations to be conducted, (2) the way such evaluation efforts are funded, and (3) the technical skills, organizational and staffing limitations, and the level of complexity of intergovernmental and inter-agency involvement within and among SPAs, RPU's, local governments, and criminal justice agencies.

A study published by LEAA substantiates our findings in the four States visited that there is little or no integration of evaluation activities into the SPAs' overall management structure. Further, evaluation functions, activities, and program services lack centralized direction and effective management controls needed to accomplish evaluation goals and objectives and to meet the needs of a variety of evaluation information user groups.

### Oregon

The SPA's grant application to LEAA for 1976 part B (planning) funds contained very limited information concerning its evaluation efforts. Our review revealed an organization chart, a grant application form, a very brief task and objectives statement for key SPA personnel, and a paragraph briefly describing two evaluation units (one for the State's block grant program and one for the LEAA High Impact Anti-Crime Program). The SPA specified three levels of evaluation (intensive, assessment, and monitoring) and set a goal of evaluating 17 percent of all subgrants during the first year.

SPA personnel commented on the inadequacy of block grant evaluation efforts, citing problems in the review of project objectives and evaluation components of projects to assure their evaluability. There was inadequate direction and guidance by SPA management as well as general confusion in the interpretation of LEAA evaluation guideline requirements specifying what the block grant evaluation program effort is expected to produce.

Even though SPA officials readily acknowledged the inadequacies and deficiencies in their evaluation programs and their inability to comply with Federal evaluation guideline requirements for 1976 and previous years, LEAA approved Oregon's 1976 submission as being in compliance with LEAA guidelines. No special condition regarding evaluation was placed on Oregon's planning grant.

SPA officials also cited difficulties associated with LEAA's termination of funding for the evaluation of the Portland High-Impact Anti-Crime Program activities, which the SPA was expected to provide.

### Pennsylvania

Although the SPA may have been in technical compliance with LEAA's guideline requirements for evaluation, the decentralization of many of the SPA's evaluation functions and activities presented several problems. The organizational structure of the SPA does not permit the Evaluation and Monitoring Unit to control or effectively manage the evaluation function on a statewide basis. Each of the eight RPUs is responsible for managing the evaluation of projects within its region; RPU officials have complete autonomy from the SPA in deciding which projects are to be evaluated as well as the nature and extent of evaluation activities to be carried out. There is little or no statewide coordination of these activities or uses made of evaluation results.

The SPA does not enforce its evaluation and monitoring guidelines. It merely sets forth suggested and generalized categories for decisions regarding what projects should be evaluated. The SPA evaluation director has little control over (1) which RPU projects will be evaluated or (2) the nature and extent of such RPU evaluation efforts. Further:

- Planning is not done on a comprehensive statewide basis but is performed mainly by the eight RPUs independently of each other, and the SPA compiles and consolidates regionally prepared plans.
- Evaluation results are not used to formulate statewide policy and are not considered relevant to planning at the State level.
- SPA evaluation and planning staff did not know whether or how evaluation results were used in planning and related decisionmaking processes at the RPU level.

- Information on which RPU projects funded during fiscal years 1973-75 had been or were being evaluated was not available from the SPA Evaluation and Monitoring Unit, and there is no assurance that an SPA file of evaluations performed is complete.
- The evaluation unit also was not keeping information on which evaluations were or would be outcome evaluations.
- The SPA evaluation director was not aware of which ones, or how many projects (funded at the RPU level), had been selected for intensive evaluation, according to LEAA guideline requirements for evaluation.
- One of two RPU directors does not look to the SPA for assistance, and another said he had received no tangible policy or guidance in evaluation or planning.

On the basis of these factors, as well as those discussed in preceding chapters, we concluded that the SPA Evaluation and Monitoring Unit was not (1) coordinating the monitoring and evaluation efforts of RPUs or (2) effectively insuring that evaluation results are incorporated into the State comprehensive planning process.

In addition, we believe that the SPA was failing to comply with the following LEAA guideline requirements:

"The SPA may, but need not, delegate some or all of the evaluation responsibilities set forth in these guidelines to regional planning units within the state. However, the SPA will remain ultimately responsible for seeing that these responsibilities are carried out."

Because SPA officials did not know, or have control over, the nature or extent of RPU evaluation activities and did not know how RPUs used evaluation information, we question how the SPA could discharge its ultimate evaluation responsibilities as set forth in LEAA guideline requirements.

### Kansas

We believe that the SPA's evaluation effort has not been in compliance with LEAA guideline requirements regarding

the management goal and is not likely to be in the foreseeable future. The limitations of current assessment procedures employed by the SPA and its decision not to perform intensive evaluations (due to past failures and lack of satisfaction with evaluation results) are unlikely to be remedied without corrective measures. However, we hold little optimism for any meaningful improvement in the organization, management, and direction of the SPA's evaluation program given two factors:

--The 50-percent reduction in SPA personnel pending at the time of our review.

--The lack of oversight and monitoring of SPA evaluation efforts by LEAA to insure that evaluation guideline requirements are being met.

An SPA official responsible for evaluation efforts stated at the time of our review that part of the problem rested with the lack of defined authority assigned to the LEAA regional office.

### California

At the time of our review, the SPA had no management system for conducting evaluations and using evaluation results by the SPA nor even a rudimentary program- or project-monitoring system. Further, the SPA is not providing guidance to the RPU's nor has it knowledge of the specific involvement of RPU's in evaluation activities. As shown on page 31, LEAA has expressed concern over California's failure to comply with its evaluation requirements and indicated it would be taking certain actions.

### FREQUENT CHANGES HAVE CAUSED CONFUSION AND DIFFICULTIES

Frequent changes in LEAA and State administrations and in their evaluation policies, guidelines, and requirements have complicated evaluation efforts and strategies. In our view the frequency of such changes as well as problems and difficulties discussed in this and preceding chapters, have had a negative impact on the quantity, quality, and utility of evaluation activities and results for use in planning, decisionmaking, and policymaking.

Others have noted the influence of numerous changes in leadership at LEAA and the SPAs on the relationship and interaction between LEAA and the States and on the way



the Crime Control Act Program has been administered and the results achieved. LEAA has had five administrators in 7 years, each with his own, and often differing, policies, priorities, and philosophy.

At the time of our review, only 6 of the States still had the same SPA director they started with, 20 SPAs had had 2 directors, and 1 State had had 15 SPA directors. On the average, each State had three SPA directors since 1969; the average length of stay was 2 years.

Following each change of administration, internal reorganizations occurred within LEAA to accommodate the new or differing emphasis of the new administrator. These reorganizations not only absorbed much staff time, effort, and repeated reorientation to new organizational roles, but caused frequent changes in relationships with SPAs. Some LEAA administrators stressed "capacity building" and "technical assistance," and others have been less willing to accept a leadership role in their relationships, stressing technical compliance with statutory provisions.

Thus, key staff turnover accompanying changes in administrations, at both the Federal and State level, has had an unsettling influence on the program, requiring the establishment of new relationships, education, and understanding on the part of new administrators and staff. Therefore, not unexpectedly, the difficulty and confusion surrounding interpretation of LEAA guidelines and requirements has resulted in inconsistency in their application from one administration to the next.

In two States visited, SPA evaluation efforts had been or were about to be affected by the change in organizational nature of the SPA. California had scrapped its previous statewide evaluation program with a reduction in staff size from over 200 to 36 and had not developed an adequate alternative approach that met Federal requirements. The Kansas SPA, at the time of our review, was anticipating a 50-percent reduction in the size of its staff, which would affect what little evaluation capability existed.

#### Impact of frequent changes in guidelines and requirements for evaluation

The manner and methods by which SPAs approached compliance with LEAA guideline requirements for evaluation varied significantly. Since the enactment of the Crime Control Act, LEAA guidelines have undergone three major

changes. Evaluation requirements were first detailed in LEAA guidelines to the States to be followed in preparing their 1972 State comprehensive plans. Following a change in administrators at LEAA and the issuance of the March 1, 1974, LEAA Evaluation Policy Task Force report, these guidelines were radically revised and required many new provisions to be followed and addressed in the States' fiscal year 1975 planning and action programs. And more recently (January 1976), the guideline requirements were revised a third time to become effective for the following fiscal year's plans and programs.

SPA officials believed that the evaluation guideline requirements were restrictive, unclear, and unrealistic, given the level of resources available for evaluation. Some SPA officials volunteered that their SPA was not, and was unable to be, in compliance with evaluation requirements. Other SPA officials cited a lack of clarity by LEAA in specifying the extent of "intensive evaluation" expected or what exactly is meant by the terms "intensive evaluation" and "performance assessment." These officials stated that joint development of such guidelines by LEAA and the SPAs would significantly reduce the problem.

There is also apparent confusion in how LEAA personnel interpret their own guidelines in providing instruction and assistance to SPAs. A staff member of an SPA we visited told us that upon informing an LEAA regional office administrator that the SPA could not comply with many of the LEAA guidelines, the SPA staff member had been told that the guidelines were not viewed as requirements but as goals the SPAs should work toward. However, other LEAA officials have stated that the LEAA guidelines are indeed requirements that the States are expected to meet. Inconsistency among LEAA officials in the interpretation of LEAA evaluation guideline requirements were cited by an SPA official in another State (which is in a different LEAA regional office's jurisdiction). We were told that the LEAA regional office staff exercised independent judgment as to whether a State was complying with LEAA guideline requirements. Our contact with yet another regional office confirmed this.

Regional office officials responsible for reviewing the adequacy and compliance of SPA evaluation programs, plans, and activities for two of the States visited acknowledged that LEAA's evaluation guidelines are not clear. One official said that LEAA itself needs to make some basic changes before the problem of guideline clarity can be resolved. The first recommendation was that LEAA not change the guidelines so often and provide adequate procedures for full explanation

of the meaning of the guidelines and their implication for SPA operations. Secondly, LEAA should specify those requirements for which immediate compliance is expected and those which States are expected to work toward.

Another LEAA official told us that because LEAA internal guidelines for reviewing evaluation components of State plans and planning grants are useless, he relies on his own judgment and some LEAA regulations for guidance.

In surveying LEAA headquarters units having evaluation responsibilities, 25 percent of the officials responding indicated that it would benefit their unit or the agency to have more specific legislative provisions authorizing or mandating evaluation responsibilities and activities.

Of 51 SPAs responding to ACIR's 1975 nationwide survey, 58.8 percent indicated they had only "some discretion" with regard to programmatic and administrative flexibility in carrying out evaluation procedures; an additional 6 percent indicated they had "little discretion" in such matters. Further, over half the SPAs responding rated LEAA regional office assistance only "moderately helpful" in interpreting Federal guidelines; 62 percent gave LEAA regional offices similar ratings in "applying and enforcing requirements." Only 24 percent of the responding SPAs felt that LEAA makes no differentiation in enforcing guidelines and requirements in considering individual State differences.

SPA attempts at providing guidance in the interpretation of LEAA requirements and in promulgating their own evaluation guidelines to RPUs and localities evidenced similar problems regarding lack of specificity and/or lack of enforcement.

Confusion and controversy surround the articulation and differentiation of role relationships, authority, and responsibilities between LEAA, SPAs, RPUs, and local governments. In our opinion LEAA has made no clear-cut definition of roles and responsibilities of each of these levels of government with respect to evaluation activities. Better clarification is essential to anticipate adequately the evaluation information feedback needs of those responsible for exercising policy, funding, and planning decisions at all governmental levels.

In its 1975 survey of the 55 largest cities, the National League of Cities and U.S. Conference of Mayors reported that 40 percent of the respondents rated the development of LEAA guidelines as "poor." An additional 35 percent rated them as only "fair." Some comments from respondents follow.

"Unreasonable deadlines; not well defined; poorly drafted."

"They are vague, poorly timed, and in general not much assistance."

"By the time local people get this there is not time to input. Additionally, they are far too complex to be workable."

"Guidelines are often too confusing and more often seem arbitrary and contradictory. Our regional planning council does not always know the guidelines."

ORGANIZATIONAL PLACEMENT OF  
EVALUATION FUNCTIONS IS TOO  
FAR REMOVED FROM TOP MANAGEMENT  
TO BE EFFECTIVE

We have observed that the evaluation unit(s) and its director(s) are not organizationally positioned to permit ready access to top management, which is necessary, in our opinion. The level at which evaluation is carried out is crucial. A former SPA director has stated that one of the prime duties of any administrator is to insure the organizational survival and integrity of the evaluation unit and its staff. In his view this requires that the unit and its director be organizationally located as close as possible to the administrator.

In the one SPA of the four we visited that appeared to have an established evaluation program (Pennsylvania), the SPA's organizational structure did not permit the evaluation unit to control or manage the evaluation function on a statewide basis. The evaluation unit director was three levels removed from the SPA director and had little or no control over the selection of projects evaluated at the RPU or local government level or the nature and extent of evaluation work performed.

We have concluded that the organizational placement of the evaluation function is at a level too far removed from top management. We believe this encourages (1) fragmentation and duplication of effort, (2) organizational inertia, (3) competition for scarce resources (both fiscal and staff), and (4) conflict and confusion over authority in the execution of evaluation responsibilities, with resultant evaluation program services, information, and products of dubious quality and utility.

## CHAPTER 7

### BETTER COORDINATION OF EVALUATION

#### PROGRAM EFFORTS IS NEEDED

Coordination and cooperation within and between participants in evaluation processes is essential to effectively use the limited resources, expertise, and newly developed evaluation techniques for gaging the impact and relative effectiveness of Federal assistance efforts administered on an intergovernmental basis. Previous chapters described the nature of evaluation involvement or lack of it at various levels within the LEAA network; i.e., headquarters, regional offices, SPAs, supervisory boards at the SPA and RPU levels, State and local governments, and criminal justice agencies.

The complexity and timing of planning, decisionmaking, and policymaking functions carried out on an intergovernmental basis in implementing the Crime Control Act Program significantly affect the quantity, quality, and utility of evaluation activities and results. And the nature of the organization and management of evaluation program activities within LEAA, as well as at the State and local levels, impacts upon the effectiveness of evaluation efforts and information generated.

However, the results of our review of evaluation program efforts, practices, and uses made of evaluation results and information indicate significant problems in coordinating evaluation activities and related planning and action program implementation efforts at the national, State, and local levels.

#### STATE AND LOCAL PARTICIPATION IN LEAA EVALUATION PROGRAM DECISIONS IS LIMITED

LEAA has not provided for systematic and substantive involvement of State and local decisionmakers and policymakers in (1) deciding what programs and projects should be evaluated and at what level, (2) deciding how best to carry out the evaluation effort, (3) identifying and determining their evaluation information needs, and (4) deciding the most appropriate and effective feedback mechanism for communicating evaluation results.

When we asked LEAA headquarters units having evaluation responsibilities whether the States participate directly with or have input to their evaluation efforts, only 5 of the 20

units (25 percent) indicated such involvement in developing evaluation standards; only 6 (30 percent) cited involvement in developing evaluation criteria. Further, only 4 (20 percent) indicated direct participation or input by the States in developing evaluation-reporting formats and in the timing of reporting evaluation results. Only 6 units (30 percent) indicated similar involvement by the States in developing evaluation procedures; 7 units (35 percent) cited direct participation or input by the States in formulating or revising LEAA evaluation policies and guideline requirements.

### LEAA evaluation policy

LEAA's 1974 Evaluation Policy Task Force included some representation from the States by involving selected members of a committee of the National Conference of State Criminal Justice Planning Administrators. However, after the report was issued, the States were not systematically involved in decisions regarding the planning and implementation of various evaluation and research activities, either outlined or suggested by the task force. Furthermore, in reviewing LEAA's evaluation policies as well as current and past evaluation activities, the 1975-76 LEAA Evaluation Policy Working Group was commissioned by the LEAA Administrator to explore and recommend actions for resolving issues in evaluation. The States and localities were not invited to participate in these deliberations. The Administrator decided that representatives of SPAs should not attend due to the number of issues which were expected to be focused on operations "internal to LEAA" and which were felt to be inappropriate for State and local participation.

The Administrator believed that after LEAA's evaluation policy had been established and the organizational roles within LEAA clarified with respect to evaluation functions and responsibilities, States and localities, represented by the National Conference of State Criminal Justice Planning Administrators, would be invited to participate in the design of evaluation training and technical assistance efforts as part of LEAA's Evaluation Development Program. In addition, SPA administrators are to be involved in a related needs assessment process, which is to be designed to be of assistance in developing LEAA's evaluation training and technical assistance efforts.

State officials expressed concern over their lack of involvement in such matters. An SPA director told us of LEAA's failure to inform States of current and planned research and development efforts. He told us he learned

of LEAA's fiscal year 1976 evaluation plans by a letter from an organization of SPA directors; he believed that SPAs should not have to find out about such activities from non-LEAA sources. The letter stated:

"Attached for your information is the National Institutes' announcement of its plan for this fiscal year (1976). To the best of my knowledge, the SPAs' input and involvement were not solicited. Only after we've been able to review the document, can we determine whether it attempts to get answers to any of the basic questions which SPAs need to know but cannot afford individually to find out." (Underscoring supplied.)

### LEAA's National Evaluation Program

Another example of how LEAA has not substantively involved State and local decisionmakers in its evaluation program decisions can be seen in NEP. The 1974 LEAA "Evaluation Policy Task Force Report" outlined the concept which was the basis for NEP and provided for an evaluation coordinating committee. This committee was to have included representatives from LEAA headquarters, LEAA Regional Administrators, SPAs, and experts in criminal justice research and was to have, among other things, reviewed suggested topic areas for NEP phase I studies. This committee was never formed, even though the need for such a committee has been recognized. (See pp. 101 to 103.)

The 1976 Evaluation Policy Working Group report to the LEAA Administrator also noted that the coordinating committee proposed by the 1974 LEAA Evaluation Policy Task Force was to have had a strong management role. Thus a vehicle that could have involved State and local decisionmakers in managing NEP has not been utilized by LEAA.

The importance of including State and local decisionmakers in developing NEP has also been underscored by the director of a nationally known criminal justice research organization. In discussing phase I studies, he observed that phase I was an effort to assess what had already been done and that it was a "reactive" approach to evaluation.

The primary need for LEAA evaluation efforts is to build evaluation into program development before project implementation so that cogent, quality evaluation can be done. This will require involving State and local personnel so that evaluation plans can be built into projects from the beginning. NEP is not now utilizing this approach. It is

questionable whether the NEP approach will produce better results than previous LEAA and State evaluation efforts unless LEAA adopts an approach to evaluation which incorporates the input and evaluation information feedback needs of State and local decisionmakers before implementing evaluation studies.

SPA officials in three of the States visited indicated they had limited involvement in or minimal working knowledge of NEP or had experienced confusion in the planning of NEP. SPA officials in Kansas expressed their concern to LEAA in their 1976 grant application for planning moneys, stating:

"In the past, the National Evaluation Program [LEAA] has not kept the SPA or the LEAA Regional Office informed of activities in Kansas. Unfortunately this leads to many calls from contractors getting channeled to the wrong staff person. And, it leads to confusion as to who is evaluating what program. In order for the SPA to participate in a meaningful way in this important program, it is necessary that the National Evaluation Program inform us of its activities including names, addresses and telephone numbers of the contracted evaluators. This will enable the Governor's Committee to participate more effectively \* \* \*.

"In April the LEAA Regional Office requested a report on fifteen outstanding projects from the Kansas SPA. The SPA staff was informed that the report was to be used in congressional hearings. As requested, said report was submitted. Accordingly, selection of projects was based on project evaluation and monitoring results. Within three weeks after the report was submitted the GCCA [Kansas SPA] was barged with telephone calls from many different contractors requesting information about the project. It was then learned after much confusion, that the fifteen outstanding projects were not intended for congressional hearings, but were in fact candidate projects for the National Evaluation Program.

"Had the SPA staff known the real purpose of the document, different procedures for selection of projects would have been employed. The GCCA [Kansas SPA] would like to establish more direct communication channels with the National Evaluation Program [LEAA] so this type of situation can be avoided in the future \* \* \*."



LEAA EVALUATION INITIATIVES  
ARE NOT BASED ON A THOROUGH ASSESS-  
MENT OF STATE AND LOCAL USERS' NEEDS

Many of LEAA's evaluation program initiatives focus primarily on marketing and disseminating visible products which are assumed to be of utility to planners, decisionmakers, and policymakers at various governmental levels and/or the research community. Operational and management adaptations of LEAA's evaluation research efforts have not adequately addressed or provided for meeting the needs of States and localities to measure the impact and effectiveness of funded programs and projects. We found that many State and local officials are not satisfied with LEAA and State evaluation program efforts.

SPA officials in three of the four States visited were concerned about the substance of LEAA evaluation efforts and dissemination of results. One SPA director believed that LEAA spends millions of dollars on research and development but is doing little to tell each SPA what has been produced as a result of such efforts.

An evaluation director with another SPA cited the absence of helpful evaluation information feedback from LEAA about projects that were unsuccessful and stated that LEAA asks the States about their "best" projects but not for information on unsuccessful ones. An SPA staff member in another State believed that LEAA does not have a good perception of SPA needs and cited the need for better communication between LEAA and the States.

The SPA director in yet another State was uncertain as to how NEP is functioning to provide information to the user; he believed it would not be beneficial if the intent is to "sell" projects to the States.

Some LEAA officials criticized LEAA guidance, and one stated that LEAA evaluation programs fall short of substantially meeting the evaluation needs of SPAs, RPU's, and others. An LEAA official explained that in most cases evaluation reports are not available when LEAA, the SPAs, or State or local officials are making re-funding decisions.

Our survey of key State officials having decision-making and policymaking responsibilities also indicated there has been limited consultation by LEAA to determine their evaluation information needs and in specifying what should be evaluated, how often, and at what level of intensity as part of evaluation requirements set by LEAA.

## LEAA's Knowledge Program not coordinated

LEAA's efforts to meet the Knowledge Goal, as outlined by the 1974 LEAA "Evaluation Policy Task Force Report," are not coordinated and do not make the best use of available resources. The 1976 LEAA Evaluation Policy Working Group Report to the Administrator stated that "knowledge-building" activities were underway in several offices and under several programs and projects but that these activities were not structured in a manner that would produce the quality or amount of information that would be possible under a more systematic approach.

Authority for evaluation "knowledge" efforts is fragmented, and activities are diffused throughout LEAA. Related evaluation projects and programs can be undertaken by two or more LEAA headquarters offices at the same time without coordination. There is little uniformity from office to office in evaluation decisions or policies.

LEAA discretionary fund and National Institute grants and projects have not been fully coordinated with Knowledge Goal activities and have not been structured to develop comparable evaluation data for the Knowledge Goal. However, the National Institute's Office of Research Programs has recommended using discretionary funds and other National Institute activities for linkup with the NEP phase II projects.

Although evaluation has reportedly been given priority in LEAA, there is a lack of resource commitment to the Knowledge Goal. Recommendations have been made concerning the Knowledge Goal, but these recommendations have not addressed where needed resources would come from to implement them or to modify action programs and projects to obtain additional, necessary data and information.

According to the NEP Director, the coordination of LEAA evaluation efforts is hampered by frequent turnover in SPA personnel. Even though the States were briefed on NEP goals and objectives, there is some confusion. States still occasionally request NEP (LEAA) to evaluate specific projects, which is not NEP's intended role.

## LEAA's Compendium of Selected Projects

This compendium is yet another example of a marketing effort that may or may not be of utility to planners and decisionmakers.

In 1974 LEAA initiated an effort, informally referred to by LEAA staff as "Project Scheherazade," to compile a list

of "successful projects." To be included in the compendium, LEAA-funded projects had to meet four conditions. The projects must (1) have been operational for a least 1 year, (2) give substantial evidence of having had measurable impact on reducing crime or improving the operation or quality of the criminal justice system, (3) be cost effective, and (4) be adaptable to other jurisdictions.

A survey was conducted in March 1975, and each SPA administrator and LEAA program director was asked to select 10 to 25 projects that met the above criteria. Of the 85,000 projects which had received LEAA funding at that time, 1,265 were submitted and 650 were included in the final list, which was published in June 1975 as "A Compendium of Selected Criminal Justice Projects." This compendium included LEAA-designated exemplary projects, prescriptive packages, promising projects, and service projects.

A review of the compendium by a research foundation showed that for over one-third of the sampled projects, LEAA included editorial remarks. These remarks were in the "impact" sections where the claims made for the project seemed to exceed the data provided; the remarks indicated problems in methodology used or lack of data to determine the impact of the program.

In his March 4, 1976, statement before the Subcommittee on Crime, House Committee on the Judiciary, the LEAA Administrator stated that one-third of the projects included in the compendium were "considered especially innovative and have high levels of outcome evaluation." However, the project director for one of LEAA's major evaluation program efforts has stated that of those projects reviewed as part of NEP phase I studies, very few have information on project outcomes.

#### DIFFICULTIES AND PROBLEMS OF COORDINATING THE EVALUATION OF LEAA'S HIGH IMPACT ANTI-CRIME PROGRAM

LEAA's High Impact Anti-Crime Program (Impact Cities Program) was a \$160 million effort begun in fiscal year 1972 to reduce the incidence of stranger-to-stranger crime (murder, rape, assault, robbery, and burglary) in eight major metropolitan cities by 5 percent within 2 years and by 20 percent within 5 years from program implementation. Inadequate evaluation planning and poor coordination of evaluation activities and responsibilities at Federal, State, and local levels are shown by the lack of conclusive evaluation findings concerning the overall impact and relative effectiveness

of the program as reported by the contracted national level evaluator (The Mitre Corporation).

A major element of the Impact Cities Program approach was the emphasis on improving criminal justice system agency capabilities through "crime-oriented" planning, implementation, and evaluation. This process was part of a program which paralleled the administrative structure of the LEAA block grant program in that Federal, State, and local government levels were to be involved and were to have had roles.

LEAA regional offices retained final approval authority for plans, projects, and evaluation components; LEAA headquarters monitored the development and progress of the program, which by definition included its evaluation. The SPAs were responsible for monitoring the financial and administrative aspects of the program and, in certain cases, such as in Oregon, for evaluating the efforts of the cities in which the Impact programs were implemented. Strong emphasis was placed on (1) evaluation as the chief tool for producing new knowledge about anticrime effectiveness, specific crimes, and offenders, victims, and settings and (2) the process of introducing innovations into the criminal justice system at three levels:

- The local government and/or project level.
- The national level (for the eight Impact cities).
- A global level to determine overall program effects.

In addition, the program emphasized achieving national crime reduction goals through a demonstration effort targeted to eight major cities using the new federalist philosophy in a three-way partnership under Federal, State, and city auspices. However, the roles and functions each "partner" would assume were not clearly specified and differentiated.

The resultant lack of coordination and inadequate time to plan effectively for the evaluation of the program was cited by the National Level Evaluation as having contributed to weaknesses and omissions in stated procedures for achieving program goals (e.g., knowledge about crime reduction impact and relative effectiveness of different program components). Reported failures to define and/or follow through on organizational responsibilities were most critically apparent in (1) the relative absence of lateral coordination among those Federal agencies which share anticrime objectives similar or related to those of LEAA and (2) the paucity of technical assistance provided to participating Impact cities

and criminal justice agencies in planning, evaluating, monitoring, and managing their anticrime projects. Promises of coordination across Federal agencies, obtained by the Attorney General in 1971, were not maintained, and cooperation with the Impact Program broke down within the first 6 months of the program. No mechanism was developed for joint planning at the "working level" across Federal agencies.

Furthermore, the specific approach of Impact Cities relegated the responsibility for assuring adequate evaluation planning and monitoring of the projects and the evaluation to the cities; quality control and review of their adequacy rested with the SPA and/or the cognizant LEAA regional office.

Under this intergovernmental Federal assistance effort, LEAA did not mandate:

- Standards for evaluation.
- Requirements for comparable and uniform data (for planning and evaluation purposes).
- Systematic monitoring of State planning and assistance functions relative to evaluation of the Impact Program.

The absence of such management controls and related coordination between Federal, State, and local levels had a negative impact upon the adequacy of evaluation efforts. The National Level Evaluation report stated that target cities had been allowed to conduct their own evaluations. LEAA mandated no specific evaluation designs and methodologies and exerted no leverage to insure that necessary data was being collected. To make matters worse, in terms of deriving some national scope to the evaluation of the Impact Cities Program, it was assumed that each of the eight participating cities would perform all the necessary data collection relative to project evaluations, which would then be used as input for the national level evaluation.

To achieve an assessment of impact in terms of crime reduction outcomes attributable to the Impact Cities Program overall, a series of victimization surveys were required to measure crime changes over a period of time. However, the national level evaluation was scheduled to be completed before the second victimization survey. The National Level Evaluation report stated that without an appropriate evaluation design, it could not provide for an assessment of crime reduction outcomes attributable to the Impact Program. Thus the evaluation of program results was seriously deficient.

Dependence upon local data sources limited the type of evaluation strategies which could be employed in the national level evaluation. In addition, reported cost constraints:

- Prevented the use of valid control or comparison groups using non-Impact Program cities.
- Precluded area- or target-group-specific data collection within the Impact cities.
- Effectively prevented substantive presence of the National Level Evaluation contractor in the eight Impact cities to remedy local evaluation problems and data deficiencies.

Consequently, the National Level Evaluation Report stated that no experimental or even quasi-experimental design could be generated and the resultant national level evaluation had concentrated on "process" rather than "outcome."

The report also cited that problems experienced in some participating cities in "operationalizing" the Impact Cities Program approach (crime-oriented planning, implementation, and evaluation), were interrelated and affected the evaluation process and resultant information. The pattern observed by the national level evaluation contractor for these cities typically involved:

- Failure to collect data and substantiate crime problems and priorities on a national basis.
- Gaps in initial planning, which were discovered during the program implementation phases, led to uncertainties in priorities and precluded linkage of anticrime strategies based on sufficient analysis and identification of crime problems.
- Lack of baseline data for evaluation.
- Inadequate evaluations.
- Failure to affect and modify projects through evaluation information feedback on a timely basis.
- Most importantly, inability to assess and identify achievements of anticrime projects.

Major implementation problems reported by the National Level Evaluation also included delays in staffing and lengthy

administrative procedures, attributed to inadequate interagency communication and coordination. The turnover in top management personnel in LEAA in June of 1973 and the disappearance of a policy board, initially assigned responsibility for exercising stewardship over the impact program, acted as a further deterrent to coordination.

Other significant problems associated with evaluation in the Impact Cities Program outlined in the National Level Evaluation report included, but were not limited to, the following:

- Evaluation plans were not developed and reviewed for about 40 percent of the 233 projects implemented.
- Only 8 of the 149 (5.4 percent) evaluation components analyzed by the national level evaluation contractor qualified as excellent.
- Key factors limiting evaluation plan performance were lack of technical assistance and the failure to allocate and tie funding for evaluation to the evaluation planning timetable.
- LEAA failed to require the collection of necessary baseline data and to set evaluation design prerequisites.
- Only 17 of 119 (14.3 percent) selected project evaluations, which were sufficiently complete to permit a technical review by the National Level Evaluation contractor, employed a sufficiently rigorous evaluation approach which could permit an assessment of project outcomes.
- Quality of evaluations performed was inhibited by the inadequacy of evaluation research technology and tools then available, lack of dissemination to participants of technology which did exist, and a failure to hire or replace staff with the expertise to develop or maintain evaluation capability.

In summary, the report stated that the evaluation of the eight-city High Impact Anti-Crime Program did not address the question of programwide effectiveness. Project level evaluations of various anticrime strategies indicated that only 33 of the 233 projects (14.2 percent), representing \$30.5 million (19 percent of the funds awarded), had been effective. Two additional projects were rated successful

through "secondary analysis" by the National Level Evaluation contractor. Although additional projects may have been effective, the inadequacy of evaluation (if performed at all) may have limited new knowledge and/or awareness of demonstrated effectiveness and crime reduction impact.

Problems of effective coordination as well as inadequacies and difficulties experienced in allocating, managing, and using evaluation resources, processes, and results were evident in the Impact Cities Program and bore striking similarity to deficiencies we identified in other LEAA Federal and State evaluation efforts and products.

In our view, greater emphasis must be placed on building evaluation into programs and projects before their implementation at the Federal, State, and local levels. LEAA must exercise greater leadership by providing assistance and coordinating evaluation functions and activities both within its own organization and between it, the States, RPU's, and local governments to insure that the needs of evaluation information users are being met.



## CHAPTER 8

### CONCLUSIONS, RECOMMENDATIONS, AND MATTERS FOR CONSIDERATION BY THE CONGRESS

Between fiscal years 1969 and 1978, the Law Enforcement Assistance Administration awarded about \$5 billion to State and local governments. What impact have these funds had on crime and delinquency? To what extent has the performance of the criminal justice system been improved? Which specific programs, projects, and strategies have been effective and which have not?

A cogent and systematic approach to evaluation is necessary to provide answers to these questions and to provide the objective, valid, and reliable information needed by decisionmakers and policymakers to plan and implement effective programs.

Generation of sufficient and timely evaluation information is vital to identifying what works; how well it works; what effect it has; and, importantly, what does not work and why not.

Strategies to (1) reduce, control, and prevent crime and juvenile delinquency and/or (2) improve the performance of the criminal justice system must be tested to identify which ones, if any, will lead to the attainment of the national goal of insuring public safety and reducing criminal victimizations.

#### CONCLUSIONS

Evaluation can and should be an integral part of the management, planning, and decisionmaking processes of LEAA, SPAs, RPUs, and local governments. However, our review indicates that LEAA and State evaluation activities and information are not meeting planning, decisionmaking, and policy-making needs of users at different levels of the intergovernmental block grant Crime Control Act Program. We found that:

- Not all States are complying with Federal evaluation guideline requirements.
- The amount and types of evaluation work have not been adequate.

- The quality of evaluation activities and products is questionable.
- Evaluation information users' needs are not being met.
- The allocation and management of evaluation resources need improvement.
- Better coordination of evaluation program efforts is needed.

It is not clear that LEAA and the States are any further along in

- knowing which specific program and project strategies have been successful and, importantly, which have not or
- determining what cumulative impact Federal funding may have had on the effectiveness and efficiency of Federal, State, and local government programs and services, in reducing crime and improving criminal justice system performance.

Answers to these questions must be made available to all persons responsible for planning, decisionmaking, and policymaking functions involving the allocation of resources designed to reduce, control, and prevent crime and juvenile delinquency.

Although recent LEAA efforts to reexamine its evaluation program activities have underscored the need for, and common problems experienced with, evaluation, we believe that little concerted action will be forthcoming which will measurably improve the situation existing at the time of our review.

Most of the actions recommended to the LEAA Administrator by the LEAA Evaluation Policy Working Group focused primarily on internal LEAA matters. There does not appear to be sufficient commitment to allocate substantial additional resources to State evaluation efforts. Therefore, the evaluation capabilities of the States more than likely may continue to be constrained by insufficient resources, technical assistance, and training, even though 85 percent of the money and a considerably greater proportion of the decisionmaking and planning effort rests with State and local governments. National evaluation strategies which depend on the adequacy

of prior evaluation work, or on evaluation planning and preparation of programs and projects, to assure their evaluability being performed by the States, under these circumstances, are unlikely to produce significant changes in the quality and utility of evaluation information produced.

LEAA must place greater emphasis upon building evaluation into programs and projects before their implementation at the Federal, State, and local levels. LEAA must exercise greater leadership by providing assistance and coordination of evaluation functions and activities both within its organization and between itself and the States, RPUs, and local governments to insure that the needs of evaluation information users are being met.

### RECOMMENDATIONS

We recommend that the Attorney General direct LEAA to provide for the substantive involvement of State and local officials in formulating evaluation policies, guidelines, and requirements. Such efforts should include:

- Establishing an evaluation coordinating committee composed of representatives from the Department of Justice, LEAA, SPAs, RPUs, local governments, criminal justice agencies, and private citizens to better coordinate and use evaluation programs, services, and results. This committee should be similar to that recommended by the 1974 LEAA Evaluation Policy Task Force in its March 1, 1974, report.
- Systematically assessing evaluation information feedback needs of States and localities periodically, but at least annually.

To insure that sufficient resources are available to carry out evaluation responsibilities and to improve management of evaluation functions, the Attorney General should direct the Administrator of LEAA to:

- Provide for the organizational placement of LEAA evaluation responsibilities and authority minimally at the Deputy Administrator level.
- Strengthen the evaluation capabilities at Federal, State, and local levels by providing additional resources to adequately

plan, design, and carry out evaluations and effectively utilize evaluation information. To accomplish this LEAA needs to:

1. Recruit and effectively allocate additional qualified evaluation personnel to help the States, RPU's, and local governments develop and utilize evaluation processes and results.
2. Expand technical and management assistance and training in evaluation provided to States and localities.
3. Issue guidelines requiring the States to provide sufficient funds for evaluation, and mandate the use of these funds for evaluation purposes only.

To improve the quality and utility of evaluation results and information in a cost effective manner, the Attorney General should direct the Administrator to:

- Increase the priority emphasis of the LEAA's research and development efforts and focus such efforts upon providing (1) valid and reliable measures of crime and criminal justice system performance and (2) related tools and methodological techniques for determining the crime reduction impact, relative effectiveness, and side effects of programs and projects funded by LEAA and the States.
- Develop standardized, uniform, valid, and reliable data bases, evaluation measures, and assessment criteria to determine the impact of a variety of programs on defined target populations at risk and for defined geographic areas.
- Stimulate and increase the use of program-level and outcome evaluations, to generate valid and comparable information about success rates and costs of projects which have different strategies but are designed to achieve the same or similar end results.

--Develop and require standardized reporting systems for evaluation and, in conjunction with the States, develop criteria for determining what to evaluate and for specifying appropriate levels of evaluation to meet a variety of evaluation users' needs.

--Standardize the quality control of evaluation processes and results to insure comparability, reliability, and validity of information generated for decisionmaking and planning.

--Develop and implement, in conjunction with the States, impact evaluation information systems, previously recommended by us, to promote increased dissemination and timely feedback of evaluation results.

We recommend also that the Attorney General examine and consider proposing one or a combination of the following options for changes in the legislation to be considered by the Congress.

#### Funding for evaluation

--Establish a separate part in the legislation which mandates an adequate amount of funds which may be used for evaluation purposes only.

--Mandate that a certain percentage of parts B, C, E, and Juvenile Justice funds be set aside by the States for evaluation purposes only. The funds would not be subject to pass-through and matching fund requirements.

--Require LEAA to allocate more of its discretionary funds to the States to develop and maintain more effective evaluation capabilities.

## Program evaluation advisory council

--Provide for the establishment of a program evaluation advisory council to (1) provide consultation and assistance to LEAA, (2) review evaluation programs, policies, and plans, and (3) advise the Attorney General and the Administrator of LEAA. The Office of Management and Budget, the National Academy of Sciences, the Office of Science and Technology, criminal justice research organizations, SPAs, RPUs, and local governments should be represented on the council.

## ANALYSIS OF COMMENTS RECEIVED FROM THE DEPARTMENT OF JUSTICE AND STATES REVIEWED

While the Department of Justice is not in substantive disagreement with our conclusions overall, it believes it has taken steps to deal with some of the problems noted. (See app. I.) However, given the current debate over the appropriate structure and thrust of LEAA programing, it remains an empirical question whether recent agency initiatives in evaluation will (1) be fully implemented, (2) have demonstrative effect on the quantity, quality, and utility of State and local evaluation efforts, and (3) meet the evaluation information needs of a variety of users at different levels in the intergovernmental Crime Control Act program.

Copies of the draft report were sent to each of the four State's planning agencies. Their comments were considered in the report, and changes to the report have been made where appropriate. Generally, the States agreed with our conclusions. Our analysis of agency comments and of the Department of Justice's response to our recommendations follows.

## General comments of the Department of Justice

Although the Department of Justice concurred with our assessment of the need for improvement in evaluation program efforts, it did not necessarily agree with our observations concerning LEAA efforts to reexamine and address the problems it had been experiencing with evaluation at the time of our review. We still have some concerns about the effectiveness of LEAA evaluation initiatives on State and local evaluation activities, information, and application of evaluation results in planning, decisionmaking, and policymaking.

The Department of Justice in responding to our report stated that it did not agree with "GAO's assessment that there is no apparent improvement in the State and local crime and delinquency picture." We do not say this. As we point out in the digest to this report and earlier in this chapter, we are not directly addressing the question of whether or not the State and local crime and delinquency picture has improved. Rather our concern is that

"It is not clear that LEAA and the States are any further along in

- (1) knowing which specific programs and project strategies have been successful and, importantly, which have not, or
- (2) determining what cumulative impact Federal funding has had on the effectiveness and efficiency of Federal, State, and local government programs and services in reducing crime and improving criminal justice performance."

We have not stated that no improvement has been made in the "State and local crime and delinquency picture"; merely that, given the problems and inadequacies of LEAA and State evaluation efforts and results at the time of our review, there was no way of knowing whether the State and local crime and delinquency picture had improved in terms of

--cumulative impact, or

--the relative effectiveness of different program and project strategies employed with LEAA funds.

We made a detailed examination of the information made available to us, at the time of our review, anticipating the Agency's evaluation policy directive of May 20, 1976, in our review of the findings, conclusions, and recommendations of the LEAA Evaluation Policy Working Group which provided the framework and substance of the current policy. (See pp. 22 to 23.) In addition, we examined LEAA's principal evaluation program activities underway at the time of our review. Information provided to us and reviewed after we completed our audit work in the States, selected RPUs, and LEAA regional offices, and at headquarters represented plans and policy statements pertaining to projected activities and initiatives to be developed or expanded upon. Thus it was not possible to assess the effectiveness, efficiency, and consequences of those evaluation program initiatives alluded to, but which had not yet been implemented. We did, however, examine in some detail ongoing principal evaluation program activities and, to the extent possible, anticipated the probable effects of those initiatives which were made known to us and which were just underway at the time of our review. The results of our examination and analyses can be found in chapters 2 through 7 of this report.

Evaluation information users' needs  
are not being met

The Department agrees that it " \* \* \* remains true to some degree \* \* \*," that evaluation information users' needs are not being met. However, the Department believes the number of evaluations which have been completed and used by LEAA in its planning and program decisions is growing; with results of such evaluations disseminated to criminal justice planning and operating agencies.

Should LEAA follow through in implementing its Program Development Policy of May 20, 1977, which provides for incorporating evaluation processes and results into LEAA planning and programing decisions, there could be some basis for cautious optimism. However, we believe that the positive aspects of this new policy are not likely to be realized without demonstrative support by the LEAA Administrator. And as of this writing, the position of LEAA Administrator has been vacant for over 1 year. Still to be addressed are the potential effects of such recent developments and proposals for reorganizing LEAA on State and local evaluation program activities.



Better coordination of evaluation  
program efforts is needed

The Department agrees that additional ways need to be found to improve and encourage the involvement of State and local users in planning LEAA evaluation activities. However, the Department disagrees that the authority for evaluation "knowledge" efforts is fragmented and that activities are diffused throughout LEAA. The Department cited a recent report by its study group on LEAA programs as evidence of its intent to improve the efficiency and effectiveness of LEAA programs. However, in its report the study group pointed out

"\* \* \* LEAA has over the years funded many different types of national action programs. Some of these programs have achieved positive results, but too few have been carefully designed, tested, and evaluated so as to enable the agency to learn systematically from these experiences. LEAA has also invested heavily in research, evaluation, and statistical studies. The results of these efforts, however, have not been utilized to the maximum extent possible. Research and action activities need to be routinely linked to one another so that, to the extent feasible, appropriate national action program needs affect research priorities and, in turn, research and evaluation results affect action program priorities, design, and implementation."

It is our view that the findings of the Department of Justice Study Group reinforce our findings in this regard. It would appear that the Department has some appreciation of the need to systematically link evaluation knowledge building as well as other research and action program efforts in a coordinated manner to effect improvements in their efficiency and effectiveness. However, it is not clear at this time whether recent proposals contained in the Attorney General's recommendations to the President involving reorganization of LEAA will facilitate better coordination of evaluation efforts between LEAA, the States, units of local government, and criminal justice agencies, as well as at LEAA headquarters.

Not all States are in compliance with  
Federal evaluation guideline requirements

The Department acknowledges that noncompliance by the States with evaluation requirements has been a continuing

problem and indicated that it was attempting to cope with this problem and encourage State and local compliance. The Department expected that increased availability of block grant action funds under the 1976 act would help ease significant funding problems associated with noncompliance. However, we have noted that the amount of the block grant action funds allocated in fiscal year 1977 represented a 25 percent decrease in available funds, with the fiscal year 1978 allocations representing an additional 17 percent decrease over fiscal year 1977 funds available. Therefore, it is questionable whether the Department's expectations that States will be able to meet evaluation requirements, provided available resources, is realistic, given the decreasing amounts of available funds. Furthermore, a January 1977 report by the National Conference of State Criminal Justice Planning Agency Administrators indicated that such decreases already have further reduced the capabilities of States and localities to insure program accountability.

The Department also pointed out in its response that it has adopted a more rigorous review process for assessing the likely value and impact of State comprehensive criminal justice evaluation plans and is prepared to reject those that are unsatisfactory. To date, to the best of our knowledge, no State's evaluation plan component has been rejected. Only the District of Columbia's State comprehensive plan was denied funding by LEAA, and it was for reasons other than noncompliance with evaluation requirements.

LEAA also anticipates expanding its evaluation training activities for State and local planning agencies to five area training centers at the beginning of 1978. We believe that the need for training in evaluation was evidenced by the States we visited and we are encouraged by LEAA's recognition of the need for expanded evaluation training. However, without an adequate staff and sufficient resources which can be devoted to evaluation and a stable organizational environment which is supportive of evaluation program activities, we question whether the States, RPUs, local governments, and operating criminal justice agencies will be able to fully capitalize on LEAA evaluation training opportunities.

Resources allocated for  
evaluation are inadequate

The Department considers the plan and principal new initiatives for evaluation, described as under development

for implementation in fiscal years 1977 and 1978, to be concerned with the development of State and local evaluation capabilities, planning, and decisionmaking. Furthermore, the Department believes the States are currently devoting more resources to evaluation. Upon examining the plan for developing such new initiatives in fiscal years 1977 and 1978, we are still of the opinion that the proportion of resources devoted to development of State and local evaluation capabilities (16 percent) are much less than those resources devoted to supporting LEAA's "knowledge" and "management" evaluation program activities at headquarters (84 percent) in fiscal year 1978. Furthermore, we estimated that the amount of resources devoted to evaluation by the States in 1975 was six-tenths of one percent of all fiscal year 1975 block grant moneys the States received. The figure advanced by the Department of Justice for State evaluation efforts for fiscal year 1977 was developed from estimates derived through paper-based reviews of 1977 State plan applications and amounted to 4.2 percent of part B funds only. However, 1977 part B funds represented only 13.1 percent of the total block grant funds available to the States.

If one uses the Department's figure of 4.2 percent of part B funds, by (1) applying this percentage to the total amount of 1977 part B funds to derive the dollar amounts involved and (2) comparing this amount to the total amount of fiscal year 1977 block grant resources available to the States, we find that the proportion of such resources estimated as being devoted to evaluation by the States represents about the same proportionate amount (0.55 percent) as was estimated for the States for fiscal year 1975 (0.6 percent).

#### State comments

##### California

The executive director of the California SPA considers the report "well written" and that it accurately portrayed the conditions in California at the time of our review. In his written response, the SPA director indicated that the SPA has established a new evaluation unit and consequently California's most recent evaluation efforts had not been included.

The California Department of Finance approved \$98,000 for the establishment of an evaluation function in the SPA in October 1976. This amount represents only 2.9 percent of the amount that had been allocated to evaluation program

efforts in 1975, prior to the reorganization. However, no permanent positions were authorized, and all evaluation functions had to be handled on a "contractual" basis. As of September 14, 1977, there were three persons involved, two on contract and one as a Department of Finance employee on loan to the SPA. Except for developing the required compliance documents to receive LEAA funding support, the SPA still relies upon the RPUs to see that evaluations are being done.

### Kansas

Although not associated with the SPA during our review, the current Kansas SPA director also has no basic disagreement with our findings and conclusions concerning the Kansas SPA's evaluation efforts. Although the Kansas SPA commissioned two evaluations which were performed by outside contractors in 1976 and 1977, it still will not be in a position to conduct intensive evaluations as envisioned by LEAA, due to the limited amount of staff and available funds. The Kansas SPA director stated:

"At this point in the LEAA program, we are experiencing a reduction in administrative funds for the SPA; therefore, in all candor, it must be stated that any improvement in the area of evaluations is highly dependent upon the funding provided by the LEAA. It appears the LEAA experience of necessity has been one of trial and error in an area which needs Federal funding, that was a long time in being recognized and may be drastically reduced before it can make an impact."

### Pennsylvania

The Pennsylvania SPA director commented that the SPA reviewed the report "with great interest." Overall, the SPA felt that many of our conclusions regarding the evaluation program merited consideration, particularly in the context of restructuring LEAA.

Most of the SPA's detailed comments focus on providing updated information and clarification of the role of evaluation in the SPA and RPUs with respect to the decentralized nature of many SPA evaluation functions among its RPUs. In the SPA's view, since September 1976 "most functions are not decentralized," in that subgrant applications and assistance to subgrantees are also carried out by the staff at SPA headquarters, and major project and program evaluations are "managed" or carried out by the staff of the SPA's Evaluation and Monitoring Unit.

RPU staff members are still involved in the evaluation of RPU projects; however, the differences or variation in evaluation activity from one RPU to the next was "to be expected," according to the SPA director, because of the regional planning unit structure in Pennsylvania.

The SPA is continuing to try to find the best balance regarding centralization/decentralization and standardization of various evaluation functions and responsibilities in order to meet the needs of local communities and fulfill LEAA requirements. One example here is the SPA's recent promulgation of additional guidelines for "intensive program evaluation," which describe "possible" methodologies for carrying out evaluations which are designed to meet LEAA guideline requirements for intensive evaluations. (See pp. 40 and 41.) Also, according to the SPA director, the SPA has put more emphasis on "strategic" planning on a statewide basis, for which evaluation results and recommendations are considered by the SPA to be relevant. In responding to our report, the SPA director concluded:

"In summary, the situation in terms of both organization and functioning has changed in the past 2 years. The SPA has placed a greater emphasis on planning and technical assistance and centralized much of the activities related to funding responsibilities. The changes have affected the way evaluation is carried out. Although we are attempting to improve our operations, and to resolve many of the problems stated in the report, we have found no simple solutions, especially in light of increasing demands for diminishing resources." (Underscoring supplied.)

### Oregon

The Oregon SPA did not provide a response to the draft report we sent it.

### Department of Justice response to our recommendations

Provide for the substantive involvement of State and local officials in formulating evaluation policies, guidelines, and requirements

The Department believes that establishing an evaluation coordinating committee, such as we recommend, would hamper

LEAA's implementation of its current and new evaluation program initiatives. It feels that the States have had sufficient opportunity for input to LEAA evaluation policy and programing through review and comment on evaluation guidelines promulgated by LEAA, with which the States must comply. In the Department's view: "An ad hoc approach to participation in specific aspects of the evaluation program is a far more effective mechanism \* \* \*." However, in its response the Department agreed that participation "in selected areas" by operating agencies could be improved and that citizen participation might also be advisable, preferably in developing information requirements and design of actual evaluation studies. In addition, the Department agreed that additional ways need to be found to improve and encourage the involvement of State and local users in planning LEAA evaluation activities; particularly during the evaluation planning and design phase.

In our view these are conflicting positions indicating that such input is welcome in the actual planning and design of specific evaluation studies but not necessarily in the development of policies and guidelines which set forth the scope and methods by which evaluation information needs will be addressed. Furthermore, we continue to disagree with the reactive approaches to evaluation which previously have been taken by LEAA. More needs to be done to provide for the systematic and meaningful involvement of prospective evaluation users in advance to insure that the utilization of evaluation processes and results in planning, decisionmaking, and policymaking will be maximized. We believe our recommendation for establishment of an evaluation coordinating committee continues to be valid and appropriate.

#### Systematically assessing evaluation information users' needs

In response to our recommendation that LEAA conduct systematic assessments of evaluation information feedback needs of State and local users, the Department agrees that it will be useful, but believes that it is not economically feasible, and that routine reports and monitoring of evaluation programs provide more appropriate vehicles for the majority of these needs. However, the Department goes on to say that programs selected for evaluation studies should be the primary targets for evaluation information needs assessments. In our view, the selection of programs for evaluation prior to establishing what evaluation information is needed, and without some advance

knowledge of users' needs, is analogous to "putting the cart before the horse" and is thus inconsistent, inappropriate, and likely to continue to result in a lack of congruence between meeting decisionmakers' and policymakers' needs and producing high quality evaluation results which are of utility.

#### Organizational placement of evaluation responsibility and authority

The Department stated that, at present, authority and responsibility for evaluation is exercised by the LEAA Deputy Administrator for Administration through LEAA's Office of Planning and Management, but it said the delegation of responsibility and authority will probably be reexamined. Our concern is that the policy direction of all evaluation efforts be at a consistently high enough administrative level to insure effective management of the evaluation function. It was not clear at the time of our review whether the Deputy Administrator for Administration exercised such management direction and oversight with respect to LEAA's evaluation activities. Since February 1977 there has been no Administrator or Deputy Administrator for Administration to exercise stewardship over LEAA's evaluation initiatives and ongoing activities.

#### Strengthen State, local, and LEAA evaluation capabilities

The Department stated that LEAA has increased its staff resource commitment in implementing a "redesigned Evaluation Technical Assistance Program" and has established five Evaluation Technical Assistance Resource Centers with expanded evaluation training offered through co-located Area Training Centers. Although we agree that an increased commitment is needed and is a step in the right direction, the level of staff commitment and resources to be actually devoted in relation to States' and localities' technical assistance and training needs is not specified. Thus it is not possible to determine whether the level of intended expansion in "commitment" will be sufficient.

According to the Department, LEAA's most recent evaluation guidelines require State grant applications to include some evidence that resources are being allocated by the SPA for the execution of its monitoring and evaluation responsibilities. However, no specific minimum level is set forth in these guidelines. We believe, based on our audit work, that LEAA, after it approves States' grant

applications, does not adequately follow up to verify that the SPAs actually commit sufficient resources to support evaluation activities.

Improving the quality and utility of  
evaluation results and information in a cost  
effective manner

The Department advanced LEAA's adoption of an Action Program Development Process as evidence of a major step in this direction. As pointed out on page 166 we are encouraged by the positive nature of this process and its congruence with the model we have advocated. We believe that the impact of this new policy will depend on the level of commitment and support it receives from a new LFAA administration. However, it is still not clear to what extent the new Action Program Development Process, which is primarily internal to LEAA's own action and research programming, will be interfaced with and effectively impact on improving State and local evaluation program activities and results--which are still most directly involved in accounting for a disproportionate amount (35 percent) of Crime Control Act program resources.

According to the Department, LEAA has initiated several programs to strengthen and improve evaluation methodologies and develop performance measures. We believe this is a worthwhile endeavor. However, in our view these new initiatives are likely to fall short if they do not deal directly with the problems of

- differentiating among multiple program intervention effects and
- isolating the impact of such effects upon defined target populations of potential victims and offenders or geographic areas.

Such omissions are significant because they will not permit one to determine (1) the unique contribution (or lack of it) a given project intervention may make or (2) for whom and under what conditions such intervention strategies are most/least effective. Moreover, continued inattention in these areas could further restrict development and use of program level and outcome evaluation processes and results. (See pp. 38 to 46.)

The Department also believes that LEAA has been stressing the use of program-level and outcome evaluations, while



increasing resources devoted to "intensive evaluation" efforts. Although the intensive evaluation paradigms outlined by LEAA in this regard are appropriate for addressing certain evaluation issues, it is still an empirical question as to whether the use of outcome and program-level evaluations (see pp. 4 to 7) performed and used by States and localities has significantly increased over what we observed at the time of our review.

The Department believes the development of required, standardized reporting systems for evaluation along with criteria for specifying what to evaluate and for specifying appropriate levels of evaluation to meet a variety of evaluation user's needs, is being accomplished by the National Institute and by LEAA's grant monitoring system. In their overall response the Department pointed out that LEAA's present evaluation policy requires evaluators of LEAA grants to include in their reports: (1) suggestions for modifying programs and projects to improve performance, and (2) project evaluation designs, including appropriate measures which must be identified as either validated or requiring further validation. However, this policy pertains only to Federal discretionary grants awarded by LEAA directly, not to State and local evaluation programs and results involving block grant funds. Furthermore, LEAA's present guideline requirements for evaluation do not, in our view, require standardized reporting systems for evaluation (which would incorporate the elements exemplified in tables 1 through 5, pp. 51-55), and leave it to the States' discretion as to which programs and projects to evaluate, requiring "some" intensive evaluations be performed. Thus, the guidelines do not appear to aggressively pursue the development of appropriate criteria specifying what to evaluate, or appropriate levels of evaluation to meet a variety of evaluation information users' needs.

In responding to our recommendation for standardizing the quality control of evaluation processes and results to insure comparability, reliability, and validity of information generated for decisionmaking and planning, the Department believes this recommendation is beyond the "state of the art" in evaluation of criminal justice programs.

We recognize that program evaluation research has been experiencing continued development in its concepts and priorities. However, there have been notable advances within the last 3 to 5 years. The state of the art in the evaluation of programs in the criminal justice

field is less dependent on the technical and methodological/measurement problems than on the need for concerted leadership by LEAA to assist the States and localities through the development of an appropriate range of models, methods, and procedures.

We believe also that there is scientific information on crime, delinquency, and criminal justice which would be positive in facilitating further advances in the state of the art in criminal justice evaluation research should it be consulted by LEAA. 1/

Somewhat contradictorily, the Department believes LEAA's "internal" evaluation program monitoring qualifies as an attempt to achieve the level of quality control called for in our recommendation. In our view, much more than reactive internal evaluation program monitoring will be necessary to insure that the States develop adequate and sufficient quality control processes which will result in increased comparability, reliability, and validity of information necessary for decisionmaking and planning at all levels of the intergovernmental Crime Control Act program. A systematic approach for building evaluation requirements into programs and projects before their implementation, rather than simply monitoring them after they are underway, is necessary to achieve comparability and improve the quality of evaluation results and information.

The Department also identified two LEAA activities which it believes will aid in "moving toward" the development and implementation of impact evaluation information systems, recommended by us in a previous report, to promote increased dissemination and timely feedback of evaluation results. One activity is an annual synthesis and dissemination of research results, including impact information. The other involves criteria and procedures to be developed by the National Institute for use by the States in conducting and reporting evaluation results. It should be noted that the former effort involves a relatively static system, in that evaluation results and

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1/Committee on Research on Law Enforcement and Criminal Justice, Assembly of Behavioral and Social Sciences, National Research Council, National Academy of Sciences, Understanding Crime: An Evaluation of the National Institute of Law Enforcement and Criminal Justice, Washington, D.C., National Academy of Sciences, 1977.

findings are not accessible as they are produced, to a wider audience than the agency or official who commissioned the evaluation study.

The reported efforts by the LEAA National Institute to develop criteria and procedures to be used by the States in conducting and reporting evaluation results would, if completed, represent a step in the appropriate direction. However, it is not clear whether such developmental efforts have extended sufficient opportunities to States, localities, and various other policymakers and decisionmakers to help them formulate workable procedures and criteria appropriate to meeting the variety of evaluation information users' needs at different governmental levels.

#### Options for legislative change

The Department of Justice agrees that a substantially greater amount of funds is required to adequately meet the evaluation needs of the criminal justice community. However, the Department is unwilling to entertain any of the three options we recommended or to advance alternative approaches for providing additional funds to increase State and local governments' evaluation capabilities and related program and project evaluations, in order to overcome the obstacles to effectively doing and using evaluations noted in our report.

We find this stance to be in conflict with the Department's expressed position that a substantially greater amount of funds is needed for evaluation, but States would be hesitant in allocating greater amounts for evaluation in the face of increasing demands and competition for available funds, without being required to do so.

#### Program evaluation advisory council

The Department does not feel there is a "compelling need" at this time, to establish a program evaluation advisory council. In light of recent departmental plans and proposals for reorganizing LEAA programming and organizational structure, we believe that this recommendation should receive further consideration, particularly with respect to insuring effective coordination and integration of program and project evaluation processes and results which are dependent upon, or likely to have substantial impact for, State and local governments as well as on Federal decision and policymaking processes.

Expanded Federal role in and program  
emphasis on research, development,  
demonstration, and evaluation

The Department considers that LEAA's Action Program Development Process captures the essence of our recommendation for an expanded Federal role and emphasis, although it acknowledges that this process is not on the scale which we advanced. The Department also believes the spirit of this expanded research, development, demonstration, and evaluation role is incorporated in the Attorney General's recommendation to the President for restructuring the LEAA program. In reviewing the Attorney General's recommendations, we find that an expansion in the Federal research role is called for, but it is not clear whether and how these efforts would be articulated to promote optimum use, impact, and continuation of federally sponsored initiatives under State and local auspices.

In conclusion, we view the Department of Justice's response to our report as acknowledging the problems and difficulties being faced by LEAA, States, localities, and a variety of evaluation information users operating at different governmental levels. However, we also urge the Department to reconsider our recommendations in light of recent developments noted in the Department's response concerning the proposed changes in the overall program that were presented to the President, and ongoing efforts to effect program improvements and promote efficient and effective management of this inter-governmental program.

## MATTERS FOR CONSIDERATION BY THE CONGRESS

Since LEAA funds constitute a small proportion of all governments' crime reduction and criminal justice expenditures, consideration could be given to expanding LEAA's research, development, demonstration, and evaluation role, but with greater involvement and conceptual input from States and localities in decisions and policies affecting the scope and direction of such activities on a direct basis. A significant increase in the amount of the Federal investment may not be necessary. However, a different system of allocating discretionary and block grant funds might be necessary. 1/

A national strategy to reduce crime under this approach would build upon program efforts which, based on rigorously controlled research, are proven to produce a significant crime reduction outcome. States and localities could participate in the planning, implementation, and management of projects proven to have merit.

Systematically planned variation in program approaches, which "build in" the evaluation research requirement before implementing individual project activities, would be emphasized. Those efforts which have empirically demonstrated crime reduction payoffs could then be funded under differing State and local conditions with continuing evaluation of their relative effectiveness. Programs and component projects which have proven successful in different locales could then be assumed by additional States and localities with increased confidence because of their demonstrated impact on crime and delinquency problems.

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1/See our Jan. 27, 1978, staff study "Federal Crime Control Assistance: A Discussion of the Program and Possible Alternatives," GGD-78-28, pp. 108-116, for an expanded discussion of this approach.

## UNITED STATES DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20530

January 1979



Address Reply to the  
Division Indicated  
and Refer to Initials and Number

Mr. Victor L. Lowe  
Director  
General Government Division  
United States General Accounting Office  
Washington, D.C. 20548

Dear Mr. Lowe:

This letter is in response to your request for comments on the draft report entitled "Evaluation Needs of Crime Control Planners, Decisionmakers, and Policymakers Are Not Being Met."

We have reviewed both the substantive aspects of the report and the related findings and conclusions. While GAO is correct in identifying commonly recognized needs for improvement, we do not necessarily agree with the manner in which the GAO characterizes the efforts of the Law Enforcement Assistance Administration (LEAA) to deal with the problems identified in the report, or GAO's assessment that there is no apparent improvement in the State and local crime and delinquency picture. Also, the report does not make a distinction between the evaluation activities of the Office of Juvenile Justice and Delinquency Prevention (OJJDP) and other LEAA programs. We consider it important to point out that all programs and projects supported under the JJDP program are being evaluated. Since it is a relatively new program, only a few evaluation studies are completed and available.

In terms of the State and local picture, far more resources are being applied to evaluation by the States than the report indicates. The management and quality of State and local evaluations are improving. Utilization of results has increased significantly as a growing volume of useful results becomes available.



The following paragraphs present our views on the major issues discussed in the report. However, it should be noted that one of the top priorities of the Department of Justice is to improve the efficiency and effectiveness of the Federal government's program to assist State and local governments in crime control and criminal justice system improvement. A Study Group was created by the Attorney General to conduct a comprehensive review of the present LEAA program and to undertake an analysis of the Department of Justice's program of assistance to State and local governments. The Study Group explored all options available to remedy existing deficiencies. On November 21, 1977, the Attorney General submitted a comprehensive proposal to the President which, if approved, would:

1. Increase the ability of the Federal government to manage more effectively its research and assistance programs;
2. Enhance the quality and visibility of the Federal government's research efforts, including civil justice; and
3. Increase the program flexibility of State and local governments while decreasing Federally imposed "red tape."

#### EVALUATION INFORMATION USERS' NEEDS WERE NOT BEING MET

Although this remains true to some degree, the number of evaluations which have been completed and used by LEAA in its planning and program decisions is growing, and the dissemination of these evaluation results to State and local planning and operating agencies has been extensive. It is important to recognize that the need for information always exists; no single study can be expected to answer all questions, and budgetary limitations necessarily limit the rate of progress. In general, the amount, types, and quality of evaluations have been improving, and they are increasingly being used in LEAA and disseminated to criminal justice planning and operating agencies.

#### BETTER COORDINATION OF EVALUATION PROGRAM EFFORTS IS NEEDED

The report asserts that "LEAA efforts to meet the 'knowledge goal', ...are not coordinated and do not make the best use of available resources. National Evaluation

Program 'knowledge-building' activities underway in several LEAA offices at the time of our review were not structured in a manner that would produce the quality or amount of information that would be possible under a more systematic approach. Authority for evaluation 'knowledge' efforts is fragmented and activities are diffused throughout LEAA."

We cannot agree with the statement quoted, not because all knowledge program activities occur within a single division--they do not and should not--but because the statement does not acknowledge the basis for the activities of each office or division which plays a role in the knowledge program, and more specifically in the National Evaluation Program (NEP), a central component of the knowledge program.

Although several mechanisms are in use, we agree that additional ways need to be found to improve and encourage the involvement of State and local users in planning LEAA evaluation activities, particularly during the initial phase of the evaluator's planning and design. NEP does survey all State Planning Agencies (SPA's) to identify topic areas (programs) in which evaluation studies are needed, but to date has let the SPA's ascertain the needs of the agencies within their jurisdictions based on the States' planning processes and the SPAs' direct interaction with subgrantees.

#### NOT ALL STATES ARE IN COMPLIANCE WITH FEDERAL EVALUATION GUIDELINE REQUIREMENTS

Historically, this has been and continues to be a problem. While the need for State compliance with Federal evaluation guideline standards and systematic monitoring techniques is widely recognized, it is difficult under present circumstances to actually require States and localities to gather standardized data under a uniform (and federally-determined) reporting mechanism. This is a particularly sensitive issue and may, eventually, require a new definition of Federal-State partnership in criminal justice programming decisions. Nonetheless, we are attempting to cope with problems as they exist and assist and encourage State and local compliance.

The States have increasingly indicated they recognize the need to move toward fulfilling Federal evaluation guideline requirements and many are planning, within the limited resources available, to do so. The increased availability of block grant action funds under the 1976 Act is expected to help ease a significant funding problem.



LEAA has also adopted a more rigorous review process for assessing the likely value and impact of State comprehensive criminal justice evaluation plans and is prepared to reject those which are unsatisfactory. In recognition of the need for States and local levels to develop their own evaluation capabilities, LEAA has undertaken the development of an evaluation training course for State and local planning agencies. It is being implemented nationwide through five area training centers.

#### RESOURCES ALLOCATED FOR EVALUATION ARE INADEQUATE

The report finds that "fiscal and staff resources allocated by LEAA and the States are inadequate for planning, managing, doing, and effectively using evaluation.... For FY 1976 LEAA allocated slightly less than 60 percent of the amount of funds recommended by the Evaluation Policy Task Force,...and only 21 percent of the FY 1976 funds recommended for use in LEAA's National Evaluation Program have been allocated for that effort."

The Task Force recommendations, lacking good planning information, turned out to be unrealistic. Approving and implementing these recommendations would have been beyond available staff and resources and, as it turned out, would have been wasteful of much of the resources had the rough projections of the Task Force been fully implemented.

Although the report of the Task Force was not approved by the Administrator, some of the recommendations were incorporated into program office plans and were implemented in whole or in part. However, the report of a subsequent Evaluation Policy Working Group was approved with modifications, resulting in LEAA's program plans and budget estimates as contained in the LEAA Two-Year Evaluation Plan. This plan represents a substantial effort both within LEAA and in assistance to the States at a time when the overall LEAA budget has been declining.

Our principal concern with this section of the GAO report is that it does not adequately acknowledge integration of the structure, assignment of roles and responsibilities, coordination procedures, and the planning and utilization processes into the entire LEAA program. The program is designed to cover knowledge, management, and State capacity-building policy objectives.

The following comments are in response to the specific recommendations of the report.

THE ATTORNEY GENERAL DIRECT LEAA TO PROVIDE FOR THE SUBSTANTIVE INVOLVEMENT OF STATE AND LOCAL OFFICIALS IN FORMULATING EVALUATION POLICIES, GUIDELINES, AND REQUIREMENTS. SUCH EFFORTS SHOULD INCLUDE BUT NOT BE LIMITED TO:

1. The establishment of an Evaluation Coordinating Committee comprised of members representing the Department of Justice, LEAA, State Planning Agencies, Regional Planning Units, local government, and criminal justice agencies, as well as private citizens to effect better coordination and use of evaluation programs, services, and results; similar to that recommended by the 1974 LEAA Evaluation Policy Task Force in its March 1, 1974 Report.

Implementation of current efforts and new initiatives in the evaluation programs of LEAA, the States, and localities would be hampered by a coordinating committee given the scope proposed by GAO. The States have been active for the past 2 years participating in guideline development task forces, and thus have had a major input into present block and discretionary fund evaluation guidelines. The States also participate in the review and modification of LEAA block grant and discretionary grant program guidelines through formal clearance procedures. Further, there have been two national evaluation conferences in which the States informed LEAA of their evaluation needs. LEAA has assigned high priority to its evaluation training and technical assistance programs as a result of these conferences. An ad hoc approach to participation in specific aspects of the evaluation program is a far more effective mechanism, since it allows the identification and selection of individuals with recognized experience, operating knowledge, and an understanding of specific needs questions. A single coordinating committee would almost certainly lack expertise and experience across the broad range of matters that would need to be considered.

We agree that participation of operating agencies in selected areas could be improved, and that citizen participation might also be advisable. However, LEAA would prefer

that operating agency and private citizen involvement in program evaluation focus on the development of information requirements and the design of evaluation studies. Their input would be of value in identifying and defining the questions and problems which the evaluation should address in order to provide useful answers.

2. Conducting systematic assessments of evaluation information feedback needs of States and localities on a periodic basis; at least annually.

The range and kinds of evaluation information feedback needs of all components of the criminal justice system are so extensive, in terms of operational management needs, that an assessment at the level of specificity recommended in the report is not economically feasible. Obtaining management information through routine reports and monitoring evaluation programs are the more appropriate vehicles for the majority of these needs. Programs selected for evaluation studies should be the primary targets for evaluation information needs assessments.

We agree that it will be useful to include an assessment of evaluation information feedback needs of States and localities. The NEP survey asks for identification of evaluation needs across the range of criminal justice programs and operations, and thus can serve the initial needs for identifying evaluation needs of both the block and discretionary fund programs.

TO INSURE THAT SUFFICIENT RESOURCES ARE AVAILABLE TO CARRY OUT EVALUATION RESPONSIBILITIES AND TO EFFECT IMPROVED MANAGEMENT OF EVALUATION FUNCTIONS LEAA SHOULD:

1. Provide for the organizational placement of LEAA evaluation responsibilities and authority minimally at the Deputy Administrator level.

This authority has been exercised by the Deputy Administrator for Administration through the Office of Planning and Management (OPM), with policy development, planning, monitoring, and coordination responsibilities assigned to the Planning and Evaluation Standards Division of OPM. At such time as the new Administrator is appointed, existing delegations will undoubtedly be re-examined.

2. Strengthen the evaluation capabilities of States and localities, as well as LEAA, by providing additionally needed resources to adequately plan, design, and carry out evaluations and effectively utilize evaluation information. To accomplish this LEAA needs to:
  - a. Recruit and effectively allocate additional qualified evaluation personnel to assist the States, Regional Planning Units and local governments in developing and utilizing evaluation processes and results.
  - b. Expand technical and management assistance and training in evaluation provided to States and localities.
  - c. Issue guidelines requiring the States to insure that an adequate amount of funding support is provided for evaluation, and mandate the use of these funds for evaluation purposes only.

Staff resource commitments have been increased by LEAA in implementing the recommendations of the Evaluation Policy Working Group. The redesigned Evaluation Technical Assistance Program is the principal vehicle for accomplishing this. LEAA's staff commitment to the training and technical assistance programs has also been substantially expanded. In addition, the establishment of five Evaluation Technical Assistance Resource Centers and the delivery of evaluation training through the co-located Area Training Centers constitute a dramatic expansion of assistance to the States and local government agencies.

LEAA's present evaluation guidelines do require State grant applications to include "The resources allocated by the SPA for the execution of its monitoring and evaluation responsibilities" under the Act, and "How the SPA shall evaluate intensively...selected projects, groups of projects or programs." An analysis of fiscal year 1977 State plans by LEAA indicates that the States have allocated 5.7 percent of their Part B budgets for evaluation in fiscal year 1976 and 4.2 percent in fiscal year 1977. The lower fiscal year 1977 figure reflects the expectation of increasing Part C allocations for evaluation pursuant to the provisions of the Crime Control Act of 1976. These figures are based on a review of all State plans, and reflect a markedly higher figure than the .6 percent contained in the GAO draft report.

**TO IMPROVE THE QUALITY AND UTILITY OF EVALUATION RESULTS AND INFORMATION IN A COST EFFECTIVE MANNER, THE ATTORNEY GENERAL SHOULD DIRECT THE ADMINISTRATOR OF LEAA TO:**

1. Increase priority emphasis in its research and development efforts to focus upon providing valid and reliable measures of crime and criminal justice system performance and related tools for determining the crime reduction impact, relative effectiveness, and side-effects of programs and projects funded by LEAA and the States.

LEAA has already taken a number of steps to accomplish this objective. LEAA's official adoption of an Action Program Development Process (APDP) through which new programs are developed or existing programs are redesigned is a major step in this direction. The APDP process parallels closely the model suggested by GAO for consideration by the Congress for the careful development and testing of programs, which are then evaluated intensively during the demonstration phase. This process will be the model for streamlining and improving LEAA's discretionary fund programs, and represents a substantial investment of research, evaluation, and discretionary funds.

All NEP Phase I studies include, where feasible, a proposed design for both a program level and project level intensive evaluation. Beginning in fiscal year 1978, in selected areas, proposed project designs must be subjected

to preliminary field tests by the grantee or contractor to establish their relevance and validity. As a matter of agency policy since December 1976, standard language is now included in evaluation grants and contracts requiring the evaluator to include in his report: (1) suggestions for modifying programs and projects to improve performance, and (2) project evaluation designs including appropriate measures, which must be identified as either validated or requiring further validation. In addition, the National Institute, as well as the Juvenile Justice Institute, conducts an evaluation methodology advancement program for this purpose and has done so for a number of years. A major project has been initiated to develop a performance measurement system encompassing the entire criminal justice system. Our review of the current and planned activities of this program suggests that no major additional expansion at this time would be warranted.

2. Develop standardized, uniform, valid, and reliable data bases, evaluation measures, and assessment criteria to determine the impact of a variety of program efforts upon defined target populations at risk and for defined geographic areas.

LEAA has a number of activities underway that will contribute to this objective, including the evaluation methodology project to develop criminal justice system performance measures. This is a tremendously complex and demanding task if it is intended to serve the range of programs and projects across the various functions of the entire criminal justice system. In the meantime, other efforts discussed earlier are building the necessary foundation. As noted above, the National Institute has underway a long-range program to develop and validate such a measurement system. As an intermediate step, LEAA is developing data elements within its grant and contract management information system that must be reported by all projects in order for LEAA and the States to be able to monitor progress toward the achievement of measurable objectives. As research efforts progress, this information reporting system will be coordinated so that validated, reportable measures can be incorporated into the information reporting system. Finally, LEAA has been developing a criminal justice archives capability to house, document, and make accessible data bases useful to further planning, evaluation, and research activities.

3. Stimulate and increase the use of program-level and outcome evaluations to generate valid and comparable information about the rates of success and costs for projects which have different strategies but are designed to achieve the same or similar end results.

LEAA has been stressing such evaluations in its own program and also requires some intensive evaluations of the States under current guidelines. As a consequence, the number of such evaluations, and the resources devoted to them, have substantially increased, both in LEAA and the States. As such evaluations are completed, the results will be incorporated into LEAA's annual synthesis of evaluation results and used in program decisions at LEAA as well as be broadly disseminated to the criminal justice community. This GAO recommendation proposes what is already a principal objective of LEAA's evaluation knowledge, management, and development programs.

4. Develop and require standardized reporting systems for evaluation and, in conjunction with the States, develop criteria for determining what to evaluate and for specifying appropriate levels of evaluation to meet a variety of evaluation user's needs.

As discussed earlier, this recommendation is being accomplished by the National Institute, in cooperation with the SPA's through LEAA's grant monitoring system, and pursuant to the requirement in the 1976 Act.

5. Standardize the quality-control of evaluation processes and results to insure comparability, reliability, and validity of information generated for decisionmaking and planning.

This recommendation, for the present, is beyond the state-of-the-art in evaluation of criminal justice programs. The problem is not the lack of statistical or methodological approaches, as such. The problem centers on the fact that no methodology is any better than the validity and reliability of the measures it uses, nor the methods for controlling the influence of external factors, and the criminal justice

field simply does not have the decades of carefully controlled research and field testing upon which to draw for program evaluation. The nature and limited observability of deviant behavior in the general population and the stage of professional modernization in most criminal justice operating agencies combine to create substantial obstacles to the conduct of evaluations which, methodologically, can provide accurate measurements of program dynamics and effects in the substantive areas where that need is critical.

To the extent that careful design, using validated measures and appropriate analytic procedures, can be specified by LEAA and the States--with careful monitoring of evaluation studies to insure that adequate standards are met in all aspects of data specifications, collection, analysis, and interpretation--LEAA's internal evaluation program monitoring at all levels is attempting to achieve this level of quality control. We do recognize, however, that precisely standardized measures do not have precisely the same meaning if they are obtained from differing States which have different laws, offender classification systems, and rules and procedures for processing individuals within the criminal and juvenile justice systems. Therefore, comparability of data under different criminal and juvenile justice codes often requires appropriately modified data definitions and careful interpretation.

6. Develop and implement, in conjunction with the States, impact evaluation information systems as previously recommended by GAO to promote increased dissemination and timely feedback of evaluation results.

Two activities are currently moving toward this objective: (1) LEAA's annual synthesis of evaluation and research results, which will pull together and disseminate evaluation results, including impact information, as well as other kinds of evaluation results for which there is a need, and (2) the National Institute's development of criteria and procedures to be used by the States for conducting and reporting evaluation results. These results will be incorporated into LEAA's synthesis and dissemination activities.

THE ATTORNEY GENERAL EXAMINE AND CONSIDER PROPOSING ONE OR A COMBINATION OF THE FOLLOWING OPTIONS FOR CHANGES IN THE LEGISLATION TO BE CONSIDERED BY THE CONGRESS:



1. Establish a separate part in the legislation which mandates an adequate amount of funds which may be used for evaluation purposes only.
2. Mandate a certain percentage of Part B, C and E funds to be set aside by the States for evaluation purposes only, which would not be subject to pass-through and matching fund requirements.
3. Require LEAA to allocate an increased amount of its discretionary funds to the States to develop and maintain more effective evaluation capabilities.

The GAO report indicated that .6 of 1 percent (0.6 percent) of Part B, C and E funds were collectively allocated by the 55 SPA's for evaluation purposes in FY 1975. Our own assessment is that while the overall allocation is not large, GAO's figure is underestimated. The principal problem as confirmed by the States was a lack of staff capability and experience to obtain high quality, useful results with the resources that were expended--little as they were. We would agree that a substantially greater amount is required to adequately meet the evaluation needs of the criminal justice community. To impose a quota system on evaluation without regard to need, necessary planning, available expertise, or the development of planning agency experience and capabilities, would be inefficient and ineffective. The funding incentives cited by GAO--waiver of pass-through and matching fund requirements--would not, in our view, effectively remove the obstacle of the States' hesitancy to allocate greater amounts for evaluation in the face of increasing demands for available funds.

4. Provide for the establishment of a Program Evaluation Advisory Council to provide consultation and assistance to LEAA.

While such an advisory body might be of value, it should be pointed out that the Department has set a standard that Advisory Committees only be established where there is a "compelling need." We are not persuaded that a "compelling need" exists at this time.

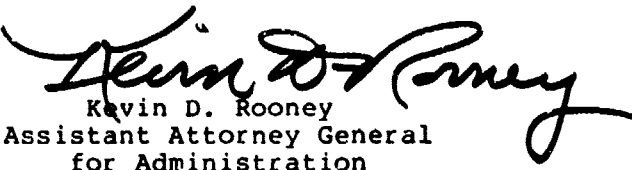
MATTERS FOR CONSIDERATION BY THE CONGRESS

One possible approach to consider is placing the emphasis of the program upon an expanded research, development, demonstration, and evaluation role by LEAA, which would continue to involve the States and localities.

Although perhaps not of the magnitude suggested by GAO, the essence of this suggestion has been adopted by LEAA in the Action Program Development Process. It is also incorporated into the recommendations which the Attorney General has made to the President for restructuring the LEAA program. No present restrictions on the use of block grant or discretionary funds pose an obstacle to State or local participation in the development of programs, or their replications, based on the Action Program Development Process.

We appreciate the opportunity given us to comment on the draft report. If you should have any further questions, please feel free to contact us.

Sincerely,

  
Kevin D. Rooney  
Assistant Attorney General  
for Administration

PREVIOUS RELATED GAO REPORTS

- "Difficulties of Assessing Results of LEAA Projects To Reduce Crime," March 19, 1974, B-171019.
- "Federally Supported Attempts To Solve State and Local Court Problems: More Needs To Be Done," May 8, 1974, B-171019.
- "Progress in Determining Approaches Which Work in the Criminal Justice System," October 21, 1974, B-171019.
- "Long-Term Impact of Law Enforcement Assistance Grants Can Be Improved," December 23, 1974, GGD-75-1.
- "The Pilot Cities Program: Phaseout Needed Due to Limited National Benefits," February 3, 1975, GGD-75-16.
- "How Federal Efforts To Coordinate Programs To Mitigate Juvenile Delinquency Proved Ineffective," April 21, 1975, GGD-75-76.
- "Federal Guidance Needed if Halfway Houses Are To Be a Viable Alternative to Prison," May 28, 1975, GGD-75-70.
- "Problems in Administering Programs To Improve Law Enforcement Education," June 11, 1975, GGD-75-67.

PRINCIPAL OFFICIALS OF  
THE DEPARTMENT OF JUSTICE  
RESPONSIBLE FOR ADMINISTERING ACTIVITIES  
DISCUSSED IN THIS REPORT

	<u>Tenure of office</u>	
	<u>From</u>	<u>To</u>
<b>ATTORNEY GENERAL:</b>		
Griffin B. Bell	Jan. 1977	Present
Edward H. Levi	Feb. 1975	Jan. 1977
William B. Saxbe	Jan. 1974	Feb. 1975
Robert H. Bork (acting)	Oct. 1973	Jan. 1974
Elliot L. Richardson	May 1973	Oct. 1973
Richard G. Kleindienst	June 1972	May 1973
Richard G. Kleindienst (acting)	Mar. 1972	June 1972
John N. Mitchell	Jan. 1969	Feb. 1972
<b>ADMINISTRATOR, LAW ENFORCEMENT</b>		
<b>ASSISTANCE ADMINISTRATION:</b>		
Vacant	Mar. 1977	Present
Richard W. Velde	Sept 1974	Feb. 1977
Donald E. Santarelli	Apr. 1973	Aug. 1974
Jerris Leonard	May 1971	Mar. 1973
Vacant	June 1970	May. 1971
Charles H. Rogovin	Mar. 1969	June 1970