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REPORT TO THE CONGRESS

Progress In Determining Approaches Which Work In The Criminal Justice System

B-171019

Law Enforcement Assistance Administration
Department of Justice

**BY THE COMPTROLLER GENERAL
OF THE UNITED STATES**

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OCT. 21, 1974



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-171019

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

This is our report on progress in determining approaches which work in the criminal justice system. At the Federal level the criminal justice programs reviewed are administered by the Law Enforcement Assistance Administration, Department of Justice.

We made our review 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).

Copies of this report are being sent to the Director, Office of Management and Budget; the Attorney General; and the Administrator, Law Enforcement Assistance Administration.

A handwritten signature in cursive script, reading "Thomas B. Staats".

Comptroller General
of the United States

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ABBREVIATIONS

- GAO General Accounting Office

- LEAA Law Enforcement Assistance Administration

- SPA State planning agency

COMPTROLLER GENERAL'S
REPORT TO THE CONGRESS

PROGRESS IN DETERMINING
APPROACHES WHICH WORK
IN THE CRIMINAL JUSTICE SYSTEM
Law Enforcement Assistance
Administration
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D I G E S T

WHY THE REVIEW WAS MADE

The need to identify what approaches best assist the criminal justice system--police, courts, and corrections--to prevent or reduce crime has been recognized since at least 1931.

Congressional concern with attempts by Law Enforcement Assistance Administration (LEAA) and the States to satisfy this need since LEAA was created by the Omnibus Crime Control and Safe Streets Act of 1968 led to a mandate in the Crime Control Act of 1973 that LEAA evaluate its programs.

The 1973 act required that the States, awarded over \$1.6 billion by LEAA through fiscal year 1973 for improving their criminal justice systems, assist LEAA by providing certain information and by making certain evaluations of their own.

To give the Congress the perspective to assess the extent to which LEAA and the States meet the 1973 legislative mandate, this report contains GAO's observations on:

--Progress LEAA and the States made before the 1973 legislation toward satisfying the need to know the approaches that work in the criminal justice system.

--Planning by LEAA and the States to meet the evaluation requirements established by the Crime Control Act of 1973.

This report also discusses problems LEAA and the States have had and need to overcome if evaluations are to improve the program.

FINDINGS AND CONCLUSIONS

Results of the State's criminal justice projects--funded under block grants from LEAA--and LEAA's research efforts must be evaluated if new and improved approaches are to be developed for attacking criminal justice problems. This type of evaluation is commonly called "outcome evaluation." (See pp. 6 to 8.)

Between passage of the 1968 act and the Crime Control Act of 1973, the States made limited progress in evaluating the outcome of their block grant projects and LEAA gave the States little guidance despite its requirement that the States do evaluations.

Before receiving LEAA funds States must submit a plan for carrying out their projects to LEAA for approval. LEAA, however, has not established procedures for its regional offices

to use in reviewing State plans to insure that evaluations would be an integral part of the States' planning process to identify and implement improved approaches.

Both LEAA and the States plan to meet the evaluation requirements of the new legislation. However, they have not defined how such evaluations are to be used in making program decisions.

States

Although the States had made some progress between 1968 and 1973, few were doing outcome evaluations; most were still planning how they intended to do evaluations. GAO's review of Michigan's and California's evaluations provides a practical perspective of the progress and problems of the States in evaluating projects and in using evaluations to improve their programs.

Michigan

In 1969 Michigan's criminal justice planning agency recognized the need for evaluation. In 1972 the planning agency began to describe evaluation factors, such as data and analyses, for the criminal justice projects throughout the State receiving LEAA block grant funds.

In December 1973, however, a planning agency official said most of the evaluations made by project personnel had not been outcome evaluations and that the few outcome evaluations made were poor.

He said for these reasons and because evaluations were not completed before the time subsequent funding decisions had to be made, they had provided little input for the agency's decisionmaking and planning.

To meet LEAA's requirement that States evaluate a specified portion of their LEAA-funded projects, the planning agency contracted with a private research organization in August 1972 to evaluate the State's efforts to reduce organized crime.

The contractor, however, could not evaluate the State's projects to reduce organized crime because project personnel had not collected needed data.

In January 1974 the planning agency revised the project-reporting process to require quarterly reports describing the evaluation progress and began redesigning evaluation factors to be used by project personnel.

The planning agency Administrator said LEAA had not provided any specific guidance on how to do evaluations or on how to use them. He believed, however, that eventually the planning agency's approach would lead to the type of evaluation system which would provide major input for program management and planning decisions. (See pp. 11 to 13.)

California

In April 1969 the California criminal justice planning agency began requiring each project receiving LEAA block grant funds through the agency to have an adequate evaluation system.

To meet LEAA's evaluation requirements, the planning agency chose to have project personnel evaluate projects from its 1973 and prior years' plans. Through September 1973 the planning agency had received 260 evaluation reports.

A planning agency analysis, however, showed general dissatisfaction with the quality of the evaluations. More importantly, the planning agency had no procedures to insure that even satisfactory evaluations were adequately considered in decisionmaking and planning.

In July 1973 a task force at the University of California at Los Angeles began developing, under contract with the planning agency, a plan to define the approaches for making evaluations which will furnish information management needs to meet program goals.

The plan was completed in early 1974, and many of its findings and recommendations were incorporated into the State's evaluation program.

The planning agency Administrator said LEAA had not provided guidance for doing outcome evaluations. (See pp. 13 to 17.)

LEAA's National Institute of Law Enforcement and Criminal Justice

The 1968 act authorized the Institute to conduct in-house research, award research grants and contracts, and instruct and recommend action to the criminal justice community. In 1971 the Institute was reorganized to better accomplish these functions.

However, as of August 1973--when the new legislation was enacted--the Institute had accomplished little in doing outcome evaluations or giving the States guidance for doing so.

For example, the Research Operations Division--responsible for in-house research--had not made any outcome evaluations of any criminal justice programs. (See pp. 20 to 22.)

The Research Administration Division--responsible for research grant and contract administration--had awarded about \$70.6 million through fiscal year 1973 for external research. Many projects were to gather information and were not intended to produce outcome evaluations. However, those projects intended to be evaluations produced little data on project impact. (See p. 22.)

The Technology Transfer Division--responsible for recommending Institute material for publication and conducting demonstration and instructional programs--had pursued these responsibilities and had developed a way to provide information to the criminal justice community.

However, almost nothing had been disseminated on the outcome of specific criminal justice projects. Several new programs started by the Division during 1973, however, have the potential to provide better information on what approaches work in various criminal justice programs. (See pp. 23 and 24.)

LEAA and State efforts to meet the 1973 congressional mandate

LEAA has taken several actions since the Crime Control Act was passed to improve its capability to determine the approaches that work in the criminal justice system. (See pp. 26 to 28.)

--The Institute established a separate evaluation division to coordinate and develop the Institute's evaluations.

--An Office of Planning and Management was created to emphasize and coordinate LEAA's overall policies and evaluations.

--An Evaluation Policy Task Force was appointed to design a comprehensive LEAA evaluation program.

In July 1973 administrators of the States' criminal justice planning agencies established a Research, Evaluation, and Technology Transfer Committee to develop

--model evaluation systems for the States;

--evaluation training programs for criminal justice planning staff,

--guidelines for gathering comparable data on projects, and

--mechanisms for collecting and disseminating research and evaluation accomplishments.

LEAA is working closely with this committee. (See pp. 28 and 29.)

LEAA and the States are becoming increasingly concerned about the need to do evaluations and are planning to meet requirements of the new legislation.

It is important that they recognize the need to define approaches for making evaluations which will furnish information program personnel need to identify and implement improvements in the criminal justice system.

RECOMMENDATIONS

The Attorney General should direct LEAA to:

--Issue guidelines requiring States to include a section in their State plans that discusses (1) how State criminal justice planning agency administrators plan to use evaluations

to assist them in making management decisions and (2) the extent to which such administrators believe their current evaluation strategies need modifying so evaluations can be useful in the decisionmaking process. This action should improve the States' planning and use of evaluations by requiring them to consider how useful evaluations have been and could be to management and also provide LEAA a basis for reviewing State actions.

--Disseminate this report to the States to further emphasize the need to do outcome evaluations that can be used in making decisions.

AGENCY ACTIONS AND UNRESOLVED ISSUES

The Department of Justice agreed with GAO's recommendations and is taking action to implement them. In addition, the Department noted steps LEAA is taking to improve its overall evaluation effort. (See app. I.) These steps should meet the evaluation needs GAO identified.

California also plans steps to improve the quality and utility of its evaluation efforts. (See pp. 16 and 17.)

Michigan commented that the GAO report was valid. However, it noted that, among other things, outcome evaluation is difficult and extremely costly and that "the causes of crime remain unknown in any real sense, and that cause and effect measurement is nearly impossible in regard to crime." Michigan also noted that LEAA, rather than the States, should have responsibility for such matters as program evaluation and research. (See pp. 33 to 35.)

There is no doubt that outcome evaluation is complicated and in some instances costly. The consequence of not doing such evaluations, however, is to reduce the planning process to chance. Evaluations are necessary so more objective decisions can be made regarding allocation of resources.

The Congress has clearly expressed its intent that the LEAA program be evaluated. Both the States and LEAA should participate in this effort since the States are an integral part of the LEAA program.

Therefore, GAO does not agree with Michigan that only LEAA should have this responsibility. Moreover, LEAA plans to involve the States directly in its evaluation efforts.

MATTERS FOR CONSIDERATION
BY THE CONGRESS

This report should assist Congress to determine LEAA's and the States' progress in meeting the legislative mandate for evaluation in the Crime Control Act of 1973.

CHAPTER 1

INTRODUCTION

The need to be able to objectively identify what approaches work in the criminal justice system--police, courts, and corrections--is essential so decisions about such matters as the need for more police or more halfway houses can be based on facts rather than on the ideological biases of decisionmakers. The need is not a new one. In 1931 the U.S. National Commission on Law Observance and Enforcement pointed out the need for

--studies to determine the causes of crime and improve the administration of criminal justice and

--research to determine what correctional approaches are most successful for particular individuals.

The next three decades, however, apparently saw little progress in meeting such needs because in 1967 the President's Commission on Law Enforcement and Administration of Justice stated:

"The Commission has found * * * many needs of law enforcement and the administration of criminal justice. But what it has found to be the greatest need is the need to know. * * * There is probably no subject of comparable concern to which the Nation is devoting so many resources and so much effort with so little knowledge of what it is doing."

THE CRIME PROBLEM

The rapid rise in crime in the 1960s was not only the impetus for appointing the President's Commission but also dramatized the urgency of the need to know what approaches might reduce or prevent crime. For example, during the 1960s, serious crime--murder, rape, robbery, aggravated assault, burglary, larceny over \$50, and auto theft--increased by nearly 144 percent; murder alone increased 56 percent.

In response, Federal, State, and local governments began channeling more and more funds into police, court, and correctional operations. As shown on page 3, in just 5 years --1965 to 1970--combined government spending for the criminal justice system increased over 100 percent. For 1973 the estimated \$17 billion expenditure more than quadrupled the 1965 level.

FEDERAL INVOLVEMENT

Congressional concern over the growing crime rate of the 1960s and the apparent inability of the criminal justice system to effectively deal with the problem led to passage of the Omnibus Crime Control and Safe Streets Act of 1968. The act proclaimed a national goal: reducing crime through improving the criminal justice system.

To help achieve this goal, the act established the Law Enforcement Assistance Administration (LEAA) within the Department of Justice to provide the States with 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 1970 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 fiscal year 1976.

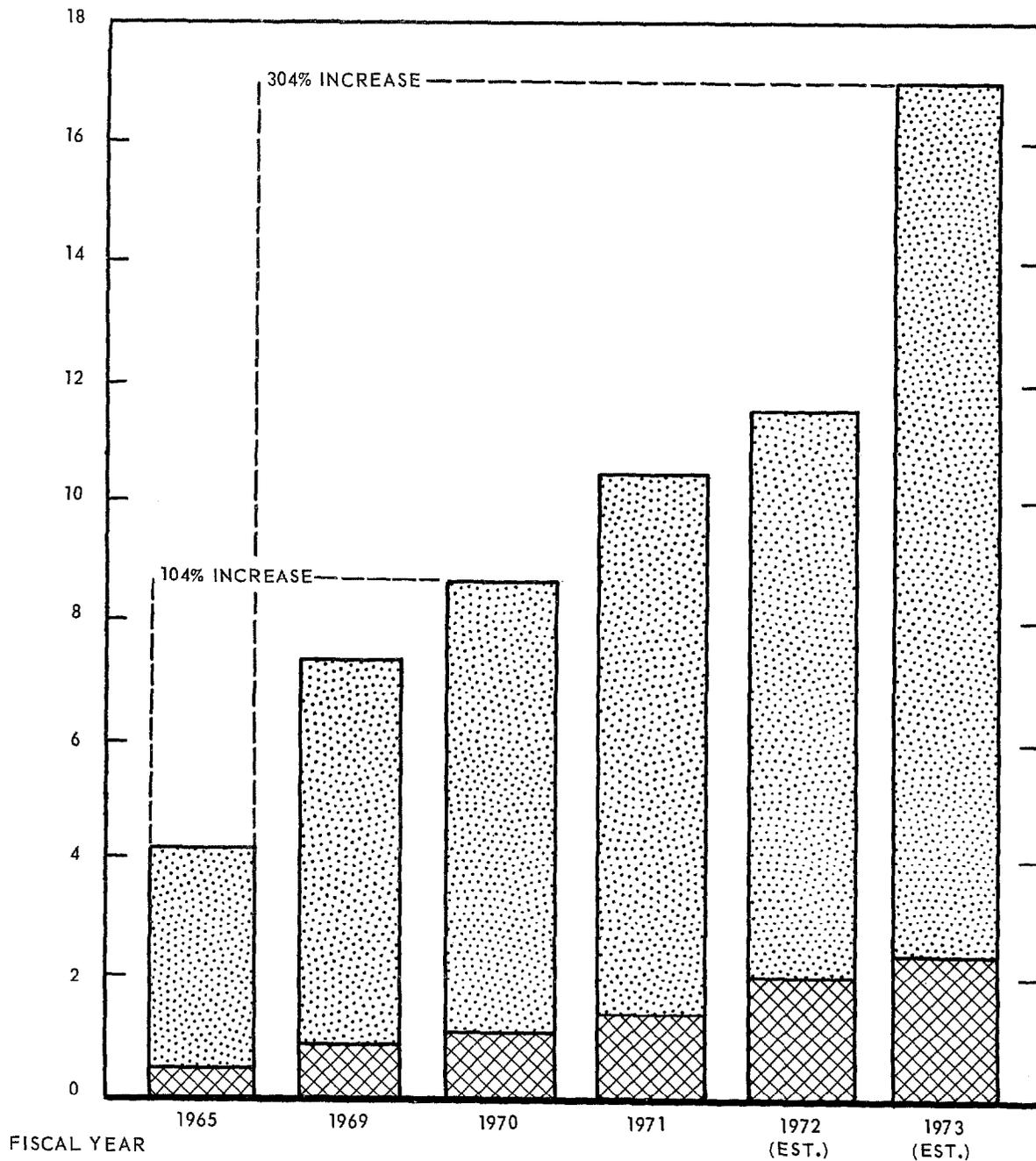
Under the 1968 act, and subsequent legislation, LEAA makes grants to State and local governments for:

- State planning agencies (SPAs), to plan and develop statewide comprehensive plans for improving the criminal justice system in each State. LEAA must approve these plans before the State can receive funds.

- Subgranting by SPAs to State and local governments for projects conforming to the comprehensive plans. These block grants are allocated to the SPAs according to their respective State's population. State and local governments must apply to SPAs for funds under the program.

GOVERNMENT CRIMINAL JUSTICE EXPENDITURES

BILLIONS OF DOLLARS



 TOTAL FEDERAL EXPENDITURES
 STATE AND LOCAL EXPENDITURES

--Conducting projects as LEAA considers appropriate.
Such grants are called discretionary grants.

Block and discretionary grants are called action grants. Of the funds appropriated for action grants, 85 percent are allocated to the block grant program. Through fiscal year 1973, LEAA had awarded the States over \$1.6 billion in block grants.

The act also established, within LEAA, the National Institute of Law Enforcement and Criminal Justice. The 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. Through fiscal year 1973, the Institute had spent over \$112 million to meet its research responsibilities. Over \$70 million, or about 63 percent, was spent on grants and contracts alone.

Both the 1968 act and the 1970 amendment authorized but did not require LEAA and the 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 the evaluation authority granted it led to a mandate in the 1973 act requiring LEAA--through the Institute--to evaluate the impact of its programs on the quality of law enforcement and criminal justice. The act also assigned the States specific evaluation responsibilities.

REVIEW OBJECTIVES AND SCOPE

A previous GAO report discussed what LEAA and the States need to make evaluations which will enable them to judge the success of similar criminal justice projects.¹

¹"Difficulties of Assessing Results of Law Enforcement Assistance Administration Projects to Reduce Crime," Department of Justice, B-171019, Mar. 19, 1974.

This report's primary objective is to give the Congress a perspective to assess the extent to which LEAA and the States have changed their approaches to meet the evaluation requirements of the 1973 legislation. To do this, we determined:

- What progress LEAA and the States made toward satisfying the need to know what works in the criminal justice system under the broad authority for evaluation granted by the original legislation and the 1970 amendment.
- How and if LEAA and the States were planning to meet the evaluation requirements established by the Crime Control Act of 1973.

Additionally, we determined problems LEAA and the States have had and need to overcome if evaluations are to improve the program.

To accomplish these objectives, we:

- Reviewed the past and planned evaluation efforts of the California and Michigan State planning agencies.
- Reviewed the past and planned evaluation efforts of LEAA, particularly the National Institute.
- Examined various studies by independent research groups.
- Interviewed various officials at LEAA headquarters, LEAA regional offices, and the Michigan and California SPAs.

CHAPTER 2

OUTCOME EVALUATION: THE KEY TO FINDING WHAT WORKS

Congressional intent in the 1968 act for LEAA's block grant program and the National Institute's research was clear: the States and LEAA were to identify and implement better methods so the criminal justice system could more effectively combat crime. For example, one of the purposes of the act is to

"encourage research and development directed toward the improvement of law enforcement and the development of new methods for the prevention and reduction of crime and the detection and apprehension of criminals."

The act states further that each State plan shall, among other things:

"incorporate innovations and advanced techniques and contain a comprehensive outline of priorities for the improvement and coordination of all aspects of law enforcement dealt with in the plan * * *;"

* * * * *

"provide for research and development * * *."

Regarding the National Institute the act states that

"It shall be the purpose of the Institute to encourage research and development to improve and strengthen law enforcement."

"The Institute is authorized--

"to make continuing studies and undertake programs of research to develop new or improved approaches, techniques, systems, equipment, and devices to improve and strengthen law enforcement, including, but not limited to, the effectiveness of projects or programs carried out under this title;

"to carry out programs of behavioral research designed to provide more accurate information on the causes of crime and the effectiveness of various means of preventing crime, and to evaluate the success of correctional procedures."

Implicit in the act was the tenet that, to identify better methods, the results of the States' LEAA block grant projects and the National Institute's research projects must be evaluated. For example, such evaluations could show:

- How many participants in a correctional program were rehabilitated as defined by specific criteria.
- What the crime rate was in connection with a specific police patrol approach.
- How many individuals selected for a particular sentencing alternative, e.g., probation or institutionalization, were rehabilitated.

This type of evaluation is commonly called "outcome evaluation" and is designed to objectively determine a program's progress toward an overall goal, e.g., criminal rehabilitation.

Outcome evaluations can be distinguished from other types of evaluations, such as

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

Outcome evaluations for individual programs--even though providing useful information to gauge the program's performance--can serve only as an objective impetus for improvement if they can be and are used by managers as a basis for comparing programs and, consequently, for making appropriate policy and program changes.

For example, assuming that outcome evaluations are done for various programs seeking to rehabilitate criminals by employing innovative or untried techniques, the programs could be separated into two groups:

- Programs that result in better outcomes than traditional or previous methods.
- Programs that result in worse outcomes than traditional or previous methods.

However, this assumes that the planning for evaluations envisioned such a separation and the outcome measurements were comparable. For example, if the outcomes of several criminal rehabilitation programs were measured by studies of individuals after release from the programs, the outcomes might not be comparable if the followup periods were different.

The consequence of not doing such evaluations or failing to plan for evaluations which permit comparing the success of various approaches is to reduce the planning process to chance, with decisions being made on gut feelings. Effective programs could be stopped and, conversely, less effective programs could be perpetuated.

This does not mean outcome evaluation is easy, especially in the criminal justice area because of the difficulty of removing extraneous variables to determine the true causes and effects of projects to reduce crime. But efforts to effectively complete such evaluations have to be made so more objective decisions can be made regarding the allocation of resources.

CHAPTER 3

LIMITED EVALUATION RESULTS BY THE STATES

Between the passage of the 1968 act and the Crime Control Act of 1973, generally the SPAs made limited progress in determining the outcomes of their block grant programs. Despite requiring the SPAs to make evaluations, LEAA provided little guidance for doing so. Moreover, LEAA had no assurance that evaluations made or planned would be used to achieve improvements.

LEAA's requirements for evaluation were published in guidelines to be used by the SPAs in preparing their annual plans. These guidelines required that, beginning with fiscal year 1972, SPAs were to select one of the following alternatives:

--"Evaluate 15% of the total number of subgrants awarded in FY 1972.

--"Evaluate 15% of the total dollar value of subgrants awarded in FY 1972.

--"Evaluate all of the subgrants awarded in one program area."

The guidelines permitted the evaluations to be done by the SPA staff, the subgrantees, or independent groups. Copies of completed evaluations were to be sent to LEAA.

AN OVERVIEW

During 1972 Indiana University's Institute for Research in Public Safety--as part of a contract from the Indiana SPA to develop an evaluation system--surveyed the other State SPAs to find out what was being done in evaluation. The survey results, published in February 1973,¹ showed that

¹"A Nationwide Review of Evaluation Procedures of State Planning Agencies," (Bloomington, Ind., Indiana University, Feb. 1, 1973).

--79 percent of the SPAs had some procedures for project evaluation, but

--only a few SPA evaluation plans were complete, and

--the degree of sophistication and stage of implementation of these plans varied widely.

More importantly, the survey revealed that the most common type of evaluation SPAs used was subjective and was not an objective measurement of outcome.

In September 1973 the Chairman of the Research, Evaluation, and Technology Transfer Committee of the National Conference of State Criminal Justice Planning Administrators --a national organization of SPA administrators--said:

--He generally agreed with these findings.¹

--Although the SPAs had made some progress since the Indiana survey was published, most were not doing outcome evaluations and were still in the planning stages.

--LEAA had given the SPAs little guidance on how to do outcome evaluations other than requiring the SPAs to include an evaluation provision in their annual plans.

Moreover, a 1973 report by SPA administrators stated that:

"SPA evaluation activity has varied according to available funds, staff size and competencies. The larger states have so far been the leaders, and their different approaches are an indication of the diversity of opinion concerning evaluation."²

¹See pp. 28 and 29 for an explanation of why the committee was formed.

²"State of the States on Crime and Justice," National Conference of State Criminal Justice Planning Administrators, June 1, 1973.

The following descriptions of evaluation efforts by the Michigan and California SPAs provide a practical perspective of the progress and problems of the States in determining what works and in using such information to improve their programs.

MICHIGAN

Michigan's SPA was established in 1968 with seven professionals responsible for preparing the State's criminal justice plan. As of September 1973 the SPA had 40 professionals. It had been awarded about \$69 million in block grant funds through fiscal year 1973.

Michigan's first plan, dated June 6, 1969, recognized the need for evaluation stating that "As action projects are funded, they must contain an evaluation dimension to provide concrete assessment information." But, during the first years of the block grant program, the SPA had to concentrate on developing a management system to insure the fiscal and contractual integrity of the program through auditing and monitoring. When these activities were operating satisfactorily, more attention was given to evaluation.

What has been done

In the 1972 plan the SPA described evaluation factors-- data and analyses--to be developed by the subgrantees.

However, in December 1973 the SPA's Director for Grant Administration told us that the resulting subgrantee evaluations generally had not been outcome evaluations or had been poor because subgrantees did not

--maintain sufficient statistical data or

--have the expertise to perform outcome evaluations.

He said that for these reasons and because final evaluations were usually not done until at least a year after a project was completed and thus were not available when subsequent funding decisions were made, they had provided little input for SPA decisionmaking and planning.

The SPA Administrator said that the SPA contracted with a private research organization in August 1972 to evaluate the State's organized crime program because he believed the subgrantee evaluations, at the time, were inadequate to meet LEAA's evaluation requirement. Among other things, the study was to determine

--the success of subgrantee projects in meeting their objectives, e.g., to enhance prosecution against organized crime, and

--the outcome of such projects in terms of the program's overall objective to reduce organized crime.

The study, costing about \$29,000, resulted in a January 1973 report to the SPA. The SPA Administrator said that the contractor could not determine whether the projects reduced organized crime because evaluations done by the subgrantees did not address this objective and the subgrantees had not collected data needed for the contractor to do its own evaluation. The study, however, recommended alternative evaluation methods for the subgrantees which the contractor believed would enable the subgrantees to determine whether their projects reduced organized crime.

The Administrator said that the recommendations were not used in the 1974 plan but were being considered for use in the 1975 plan.

In January 1974 the subgrantee reporting process was revised to require quarterly reports describing the current progress in evaluations instead of just an evaluation report at the end of the project. In addition, SPA personnel were redesigning project evaluation factors for use by subgrantees in evaluating their projects. The Administrator believed that eventually this approach would lead to the type of evaluation system which would provide major input for program management and planning decisions.

The Administrator said many discussions with LEAA regional office and headquarters personnel, consultants, and academic

experts led him to conclude that they too were unsure about how to evaluate criminal justice programs and could not lend much assistance. Further, through development of the 1974 plan, LEAA had not provided any specific guidance on

--how to do evaluations or

--how they were to be used.

Consequently, he had relied on the expertise of SPA personnel. Even though Michigan was only beginning to develop the evaluation information he believed was necessary, he was satisfied with the progress.

CALIFORNIA

Between June 30, 1969, and September 30, 1973, the California SPA received about \$153 million in block grant funds.

In April 1969 the SPA began requiring each subgrantee project proposal to have an adequate evaluation system. The implied purpose was to provide SPA management with decision-making information. However, the SPA did not develop a systematic plan for using evaluations at that time. California defined its evaluation policy further in May 1972 when it stated that

"Within ninety (90) days after the commencement of either the second--or third--year funding period, a detailed project evaluation will be delivered to the Council [SPA] describing the degree to which prior year project objectives have been met. * * * evaluation of the first project year will be in terms of project objectives, and subsequent years will also address system impact or crime impact."

What has been done

To meet LEAA's evaluation requirement, the SPA chose to evaluate 15 percent of the total dollar value of subgrants from its 1973 and prior years' plans by having the

subgrantees do the evaluations Through September 1973, the SPA had received 260 evaluation reports from subgrantees. For 37 of the projects evaluated, an SPA official determined the evaluation cost for each project. The total evaluation cost for these projects was \$472,516, or about 7 percent of the \$6,918,129 total cost for the projects.

In April 1973 the SPA--in its first evaluation report to LEAA--stated that subgrantee evaluations were predominantly

--poor evaluations of probably good projects and

--poor evaluations of probably poor projects.

More importantly, however, even for those evaluations considered satisfactory, the SPA did not have adequate procedures to insure that the evaluation results were considered in the planning process. This lack of any formalized plan for systematically using evaluations still existed at the time of our review. SPA officials said that decisions about the worthiness, redirection, or termination of projects had been based on their personal involvement in such activities as reviewing progress and evaluation reports, monitoring, and meetings, but they could not relate management decisions regarding projects to evaluations made of them. The extent to which evaluations affected such decisions depended primarily on the nature of the project and type of evaluation done, rather than on a systematic process that resulted in evaluations being one of the bases for making the decisions.

The SPA's 1973 report to LEAA was not the first time the SPA had expressed dissatisfaction with the evaluation program and its impact on decisionmaking. In 1972 the SPA reviewed its evaluation strategy and decided that evaluations of each project had not produced useful information for management decisions. A summary report cited numerous shortcomings, some of which were

--the lack of comparability between evaluations which claim to be measuring the same factors, e.g., recidivism;

--poorly formulated objectives;

--no clearly stated criteria; and

--bad experimental designs.

This dissatisfaction led to a change in evaluation strategy away from evaluating each project to concentrating on selected program areas using "cluster evaluations." For example, for a program area, such as "Narcotics Treatment and Rehabilitation," several projects having similar objectives and activities would be evaluated. The SPA believed that such an approach, among other things, would help insure comparability of evaluation results among projects and provide management a better basis for judging the impact its decisions had on certain program areas.

In 1972 the SPA allocated \$500,000 to support a series of such cluster evaluations. They were completed in the spring of 1974. In July 1974 the Administrator of the SPA advised us that the cluster evaluation concept was a logical step in developing an effective program-level evaluation strategy. However, he noted that the major drawbacks have been in the limited utility of the approach in making comparative assessments of outcome objectives and in insuring adequate evaluation planning and design before beginning projects being evaluated. Delayed startup for cluster evaluations sometimes precluded the evaluator from obtaining necessary data and information for those projects which ended or were nearly over by the time the evaluation could begin. We were advised that this sometimes forced "post-hoc interpretation and reduced the validity, accuracy and generalizability of the findings and their interpretation."

In July 1973, a task force of professors at the University of California at Los Angeles began developing, under contract to the SPA, a strategic evaluation plan so management could use evaluation information. The objectives of this plan--completed in early 1974--were

--To develop, with the SPA, its evaluation mission and role so its objectives and priorities in evaluation would be consistent with its overall mission and role.

- To assess the state of the art in evaluation technology and to match the SPA's needs for evaluation with what can be done.
- To assess the sociopolitical, legal, and organizational environments within which the SPA functions to determine the possible constraints on an evaluation plan.
- To construct alternative strategic plans for the SPA's approval that meet the above objectives.

In July 1974 the Administrator of the SPA advised us that a number of the study's findings and recommendations had been incorporated into the State's evaluation program.

The Executive Director also advised us in July 1974 of additional steps California will take to upgrade the quality and utility of evaluation as a tool to aid decision-makers and planners. The SPA will:

- Make available to grantees a program of technical assistance training and supportive services in criminal justice program and project evaluation.
- Pool the necessary resources to plan, design, and implement a coordinated and comprehensive statewide program of evaluation.
- Insure the development of uniform and standardized data and information bases to enable the SPA and other affected groups to assess performance to provide planning information for crime-problem solving.
- Develop and validate crime-related indicators to accurately assess the impact that projects have on reducing crime or delinquency.
- Improve the quality and utility of individual project evaluations within program areas through formulating evaluation standards and guidelines, including the development of a User's Handbook in Program Evaluation.

- Establish an Evaluation Information Reference and Resource Service for users of evaluation information as well as practitioners of evaluation.
- Implement program-level evaluation to provide reliable and comparative outcome evaluations to assess impact, effectiveness, and efficiency of SPA-funded projects and programs.

LEAA guidance

The SPA Administrator said that LEAA had not provided any guidance for doing outcome evaluations.

Likewise, the California Legislative Analyst had criticized LEAA leadership in evaluation. In a report on the SPA's budget request for fiscal year 1973-74, he wrote:

"* * * Currently, LEAA offers no guidance for California in the very difficult task of evaluating the numerous projects which are currently being funded. Yet LEAA has requirements that 15 percent of all such projects (measured by total dollar value) be so evaluated."

LEAA'S USE OF SPA EVALUATIONS

LEAA's Office of Criminal Justice Assistance was responsible for preparing the guidelines requiring the SPAs to evaluate their programs.¹ This Office was also responsible for overseeing the operations of LEAA's 10 regional offices. The regional offices, in turn, are responsible for approving SPAs' annual plans.

As part of the approval process, the regional offices must insure that the plans include the evaluation provision as required by LEAA guidelines.

¹In November 1973 the Office of Criminal Justice Assistance was reorganized and called the Office of Regional Operations. It basically has the same responsibilities as the Office of Criminal Justice Assistance.

The Chicago and San Francisco Regional Office Administrators said their regional approval process of SPA annual plans did not include judgments regarding the design or quality of the evaluation provision in the plans because

--regional office personnel lacked the expertise in evaluation necessary to make such judgments and

--the regional offices had never been delegated such responsibilities by LEAA headquarters.

The San Francisco Regional Office Administrator added that he has no plans to assist the SPAs in evaluation and that he is waiting for instructions from LEAA headquarters before he makes such plans.

The Chicago Regional Office Administrator added that, although the LEAA guideline required copies of completed SPA evaluations to be sent to the regional office, the Office of Criminal Justice Assistance had provided no guidance on what the regional offices were to do with them. Likewise, the regional offices had no policy to insure that the States would use evaluations as a basis for developing program strategy for achieving improvements.

An official of the Office of Criminal Justice Assistance agreed that the guidance that office gave the regional offices had been very general and had not addressed priorities or guidelines for approving evaluation components in State plans. He also said the LEAA requirement for evaluation by the SPAs had been too general to assist either the regional offices or SPAs. He attributed this lack of guidance to

--the absence of groundwork within LEAA on how evaluations were to be performed and

--a low priority for evaluation within LEAA before the 1973 legislation.

CHAPTER 4

FEW OUTCOME EVALUATIONS BY LEAA'S NATIONAL INSTITUTE

The National Institute of Law Enforcement and Criminal Justice had not aggressively used the broad authority granted by the 1968 act to improve the criminal justice system and had provided the States little specific guidance on how to do outcome evaluations or how such evaluations should be used to improve their programs.

The act stated that:

"It shall be the purpose of the Institute to encourage research and development to improve and strengthen law enforcement."

To accomplish this goal, the act authorized the Institute to:

1. Conduct in-house research, including the effectiveness of various criminal justice approaches and projects carried out (funded) under the act.
2. Encourage and fund research including the development of new approaches.
3. Instruct by information dissemination, workshops, and fellowships.
4. Recommend improvements to the criminal justice community.

Despite such widespread authority, a study published in early 1973 by the Lawyers' Committee for Civil Rights Under Law--a nonprofit group interested in LEAA's activities--stated that

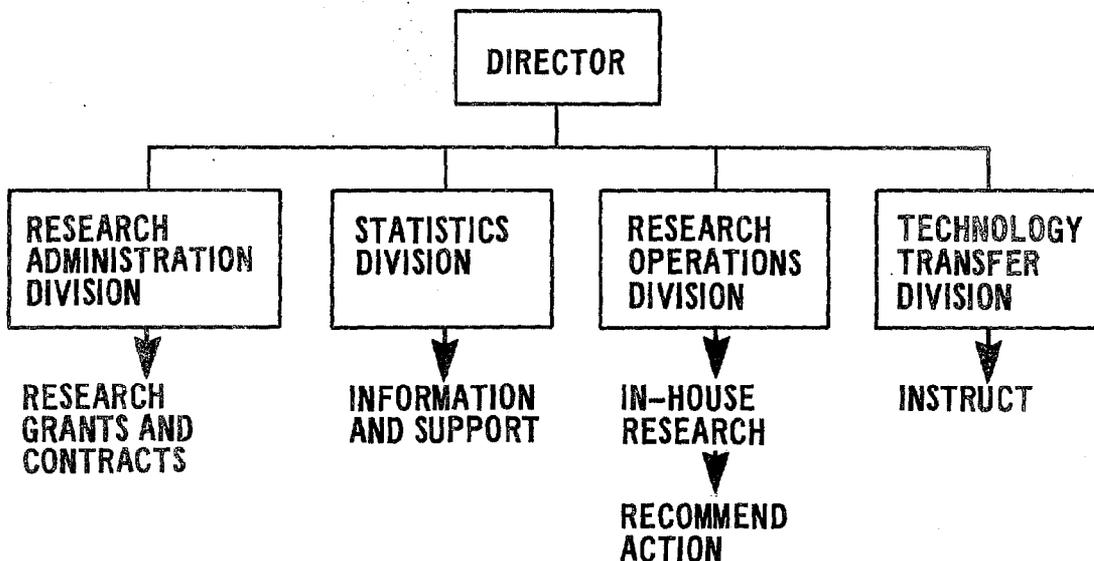
"The Institute has not performed its intended mission. Not only has research output been limited, but few of its meager findings have been made available to the public or to criminal justice officials. *** It has operated in almost total isolation from the rest of LEAA programming, with no formal mechanisms for using

its research product to provide guidance for the discretionary and block grant decision-making process."

Earlier, in 1971, a task force of Federal, State, and university officials, selected by the LEAA Administrator, concluded that:

"Almost all of the Institute's manpower is dedicated to the review of private research proposals. * * * The Institute is, in effect, being wasted on effort which has been demonstrably non-productive."

The task force recommended reorganizing the Institute and substantially increasing its in-house research. As illustrated below, the suggested reorganization closely followed the functional authority envisioned by the act:



An LEAA instruction dated August 23, 1971, implemented the task force's organizational recommendations. However, the reorganization resulted in only nominal in-house research. More importantly, both the in-house research and research grant efforts produced almost nothing in terms of outcome evaluations before the 1973 legislation.

IN-HOUSE RESEARCH

The Research Operations Division was assigned responsibility for:

1. "Carrying out research programs designed to provide more accurate information on the causes of crime and the effectiveness of various means of preventing crime. [Underscoring supplied.]
2. "Making continuing studies and undertaking programs of research to develop or improve approaches, techniques, systems, equipment and devices to improve and strengthen criminal justice.
3. "Making recommendations for action which can be taken by Federal, State and local governments and by private persons and organizations to improve and strengthen criminal justice."

The Chief of the Division, although recognizing the Division's responsibilities, said research had received only general coverage because of other duties, such as:

- Defining research problems and determining the most appropriate strategy in addressing these problems.
- Developing plans for the overall annual Institute research plan.
- Reviewing research grantees' final reports.

General research activities of the Division primarily included:

- "Book reports"--library research on what had been or was being done in a subject area. Such reports contained no recommendation or conclusions.
- Designs for requests for proposals for research contracts or grants in support of the Research Administration Division.

As of October 1973 the Division's research had resulted in 36 published reports which had been or were planned for dissemination to appropriate criminal justice system officials. However, the Chief of the Division said that only four of these were of sufficient depth and conclusiveness to be useful as a

management tool for criminal justice planners and could be considered as meeting the Division's responsibility to make "recommendations for action* * *."

But none of the four reports were outcome evaluations and only two had been disseminated. As of enactment of the 1973 legislation, the Division had not made any outcome evaluations--published or unpublished--of any criminal justice programs, including the States' block grant programs. The Chief of the Division stated that such evaluations would have required more staff and time than the Division had.

RESEARCH GRANTS AND CONTRACTS

LEAA's August 1971 instruction assigned the Research Administration Division responsibility for administering the Institute's external research program, including awarding and monitoring all Institute project grants and contracts. Through fiscal year 1973, the Division had awarded about \$70.6 million for external research. However, as of enactment of the 1973 legislation, these projects had produced almost nothing in terms of outcome evaluations.

The Director of the Institute said many of the projects were to gather information and therefore were not intended to produce outcome evaluations. Further, he said many projects that were evaluations were subjective or were concerned with how the project was operated rather than results and, therefore, contributed little toward answering cause and effect questions concerning what works. He stated, however, that several projects in process or planned for fiscal year 1973 did include outcome evaluations.

The Institute's planning document--"Plans and Projects for Fiscal Year 1973," dated March 1973--listed "illustrative" projects in process or planned by the Institute, some of which did appear to be outcome evaluations according to the description. For 54 projects listed, we interviewed the 9 Institute project monitors and determined that 17 projects were expected to produce outcome evaluations. However, as of July 1973, only 1 of the 17 projects was completed. More importantly, none of the project monitors could cite any other completed outcome evaluation project, whether or not it was included in the "Plans and Projects" document.

TECHNOLOGY TRANSFER

The August 1971 instruction delegated to the Technology Transfer Division the responsibility, among others, for:

- Recommending approval of Institute material for publication.
- Conducting demonstration projects and instructional workshops.

Even though the Division pursued these responsibilities and developed a way to provide information to the criminal justice community, almost nothing had been disseminated on the outcome of specific criminal justice projects as of November 1973.

To better fulfill its primary responsibility, the Division started several new projects during 1973, including:

1. Exemplary projects.
2. Prescriptive Program Packages.
3. "Research Briefs."

The Institute defines "exemplary projects" as those which have demonstrated notable success in operation for some time and which are suitable for use by other communities. Such projects--once identified--are to be described in a brochure which will be disseminated to the criminal justice community. A detailed operational manual will also be prepared on each project describing such matters as budgeting, staffing, training requirements, potential problems, and effectiveness measures. As of December 1973, two projects had been selected as "exemplary" and five others were being considered.

However, the brochure and operational manual on only one of the two selected projects had been disseminated. Even though statistics were compiled on this project, no outcome evaluation was made. For example, the brochure stated:

"Only a small amount of inconclusive evidence is available regarding whether or not individuals provided with the * * * project's rehabilitative services are less likely to commit new offenses * * *."

Likewise, the Prescriptive Program Packages--how-to-do-it manuals based on the "best available knowledge" in selected areas--have yet to be proven by outcome evaluations. The packages are developed by contractors that prepare synopses of programs that seem to be working. The contractor does not evaluate any projects but will use any evaluations available. The result is a document of background information and operational guidelines for a particular program area, e.g., methadone maintenance. As of December 1973, the Institute had disseminated packages on three such areas but none of the packages had been tested in operation. Nine additional packages were in various stages of development.

The third element of the Division's project dissemination program--review and publication of selected Institute research--was accomplished by publishing, beginning in December 1972, a quarterly newsletter, "Research Briefs." The briefs focused on particular subjects, presenting an overview of problems and summarizing significant projects and publications. Although the briefs appear to provide useful reference information, they have provided little information on what works because such information generally has not been developed.

The Director of the Institute told us that the Division had attempted to give the SPAs general guidance on evaluation through seminars, briefings, and publications. However, he said that because research has not been sufficiently definitive to identify detailed evaluation criteria, the Division has been unable to specifically guide the States on how to evaluate their programs.

The Director also stated that, although the need for outcome evaluation was clearly recognized, the Institute had been limited by funds and manpower from doing more and had found it necessary to establish certain operational priorities. Consequently, the Institute's major evaluations were of certain projects funded with discretionary moneys. The two primary projects--the Pilot and Impact Cities Programs--are still operating; thus, the evaluations are not complete.

COMMUNICATION CHANNELS OPENED

Even though the Institute had accomplished little toward evaluating the outcome of the more than 30,000 projects funded through the block grant program, some channels for disseminating such information had been developed.

For example, the National Criminal Justice Reference Service began operating in September 1972 to provide a central information source for the Nation's criminal justice community. The computer-assisted data base includes publications, books, and other documents covering all aspects of criminal justice. A special service includes the automatic dissemination of abstracts of recent document acquisitions to users who have indicated interest in specific subjects.

In addition, a liaison and coordination program was established in which the Technology Transfer Division briefs LEAA offices, SPAs, and other organizations on the Institute's ongoing and completed research.

CHAPTER 5

THE 1973 LEGISLATION: IMPETUS FOR ACTION

The Crime Control Act of 1973 requires LEAA's National Institute to

- evaluate the impact (outcome) of programs and projects carried out under the act and
- disseminate evaluation results to SPAs.

The act also insures accountability for these responsibilities by requiring the Institute to report annually to the President, the Congress, and SPAs on the potential benefits of research and evaluation results.

To insure the States' support of the Institute's evaluations, the act requires that the States' annual comprehensive plans provide for maintaining data and information and submitting reports which the Institute may need to meet its evaluation responsibilities. The States' plans must also provide for accurate and complete monitoring of the progress and improvement of their correctional systems.

LEAA ACTIONS

Since the new legislation was passed, LEAA has taken several actions to improve its capability to determine what type of projects help improve the criminal justice system's ability to prevent or reduce crime.

Institute plans

In October 1973 the Institute established a separate evaluation division to coordinate and develop the Institute's evaluations. As part of a 3-year evaluation plan, the Institute has proposed to

- design a project data collection and analysis system,
- do in-depth evaluations of selected program areas,

--review and analyze the results of SPA evaluations,
and

--assist in SPA evaluations.

To implement this program, the Institute requested an increase of about \$14 million for fiscal year 1975 over its 1974 appropriation. A major part of the justification for this increase will be the Institute's plan to review and coordinate the States' evaluations.

Other management changes

In October 1973 the LEAA Administrator created the Office of Planning and Management to emphasize and coordinate LEAA's overall policies and evaluations. Among the duties were

--coordinating and developing goals and objectives
for each LEAA program,

--overseeing the development and implementation of
a comprehensive LEAA and SPA evaluation program,
and

--undertaking special evaluations as directed by the
Administrator.

Further, in November 1973, the Administrator established an Evaluation Policy Task Force consisting of a technical advisor from an independent research group; the two LEAA Deputy Administrators; officials from four SPAs; and representatives from several LEAA divisions, including the Institute, the Office of Planning and Management, and the regional offices. The purpose of the task force was to

"investigate questions related to Agency evaluation activities, to design and plan a comprehensive evaluation program and to make recommendations to the Administrator of LEAA concerning policy options and alternative program implementation strategies."

As of December 27, 1973, the task force had tentatively identified three evaluation goals:

1. A research goal to ascertain those programs which reduce crime and improve law enforcement and criminal justice and those which do not.
2. An LEAA management goal to use these findings at the national and SPA levels.
3. A program goal to persuade criminal justice agencies to use evaluation in their management practices.

The Task Force issued its report in March 1974. Its findings and recommendations provided much of the basis for the actions LEAA has noted that it will take to improve its evaluation efforts. (See pp. 38 to 40.)

The task force recommended that the goals of LEAA's evaluation program be to:

- Obtain and disseminate information on the cost and effectiveness of various approaches to solving crime and criminal justice problems.
- Have performance information used at each LEAA administrative level in planning and decisionmaking to help program managers achieve established goals.
- Help State and local criminal justice system units realize the benefits of using evaluation as part of their management system.

With establishment of the Institute's Evaluation Division and the other management actions discussed above, LEAA has recognized that changes and improvements are needed if the mandate of the 1973 act is to be met.

THE STATES' PLANS

In July 1973 the National Conference of State Criminal Justice Planning Administrators established a Research, Evaluation, and Technology Transfer Committee in anticipation of the evaluation mandate of the 1973 act. The Committee chairman told us the SPA Administrators formed the Committee because they:

--Needed a standard definition of what the Congress meant by evaluation. Each SPA Administrator had his own definition because LEAA had failed to interpret the term "evaluation."

--Recognized the need for evaluations and wanted a committee to study the area, especially since most SPAs were not evaluating project results and many SPA staffs were unqualified to do this.

--Recognized that little, if any, information existed on how to evaluate project outcome.

The Committee's first meeting, in September 1973, resulted in adoption of the following objectives:

--Developing model evaluation systems for use by the SPAs.

--Developing an evaluation, orientation and training program for SPA Directors and staff.

--Developing guidelines for gathering comparable data on projects.

--Developing a mechanism for collecting and disseminating research and evaluation accomplishments.

Institute representatives agreed to assist the Committee in meeting these objectives and contracted with a private research organization to develop an outline of model evaluation systems.

Undoubtedly, the SPAs are becoming increasingly concerned about the need for evaluation and are planning to satisfy this need. It is important that they recognize the need to define the approaches for making evaluations which will furnish information program personnel need to identify and implement improvements.

CHAPTER 6

CONCLUSIONS, RECOMMENDATIONS,

AND AGENCY COMMENTS AND ACTIONS

CONCLUSIONS

The States and LEAA are faced with a goal--reducing crime--which many experts believe can ultimately be accomplished only by alleviating social conditions that generate pressures toward crime, such as inequities in education, employment, housing, and race relations. However, identifying and eliminating such causes is, at best, a longrange goal and, for the most part, lies outside the responsibilities and means of the criminal justice system.

Therefore, the system's role is to make the maximum possible contribution toward the control of crime by identifying and implementing the most effective means of

- improving law enforcement techniques,
- dissuading criminals from further crime, and
- insuring the equitable and efficient administration of justice.

Evaluating the outcome of criminal justice programs can help meet such objectives so that

- systematic improvements can be made by providing criminal justice planners and managers a sound basis for judging the realistic magnitude, make-up, and direction of future efforts and
- the maximum benefit will be received from the resources spent.

Between passage of the 1968 act and the Crime Control Act of 1973, the States made limited progress toward evaluating their block grant programs. Despite requiring the States

to do evaluations, LEAA gave the States almost no guidance for doing so. Equally important, LEAA had established no procedures in the State plan approval process to help insure that evaluations would be adequately considered in the States' planning process to identify and implement improved approaches.

Within LEAA, the National Institute, even though granted broad authority by the 1968 act to do evaluations, had accomplished very little in evaluating the outcome of projects funded under the block grant program through either in-house research or grants. Further, the National Institute had provided the States little specific guidance on how to do outcome evaluations or how to use them to improve their programs.

The Crime Control Act of 1973--by assigning LEAA's National Institute and the States specific responsibilities for evaluation--should provide the impetus for increased evaluation. The act gives LEAA's National Institute both the responsibility and authority to direct and coordinate the Nation's efforts in determining what works in the criminal justice system. Research background information gathered, evaluation problems defined in previous Institute efforts, and the information dissemination system developed should provide a firm foundation to begin meeting these responsibilities.

Both LEAA and the States are becoming increasingly concerned about the need for evaluation and are planning to meet the requirements of the new legislation, as evidenced by such actions as those taken by LEAA's National Institute in October 1973. LEAA and the States must also develop strategies

--defining how such evaluations are to be used in making program decisions and

--insuring that they are used.

The California experience--where most subgrantees' evaluations apparently had little impact on management decisions--illustrates the difficulty of developing adequate evaluation strategies. LEAA and the other States should heed the lessons learned in both Michigan and California, so their efforts will produce evaluations that management can and will use.

RECOMMENDATIONS

We recommend that the Attorney General direct LEAA to:

- Issue guidelines requiring States to include a section in their State plans that discusses (1) how State criminal justice planning agency administrators plan to use evaluations to assist them in making management decisions and (2) the extent to which such administrators believe their current evaluation strategies need modifying so evaluations can be useful in the decision making process. This action should improve the States' planning and use of evaluations by requiring them to consider how useful evaluations have been and could be to management and also provide LEAA a basis for reviewing State actions.

- Disseminate this report to the States to further emphasize the need to do outcome evaluations that can be and are used in making decisions.

AGENCY COMMENTS AND ACTIONS

Department of Justice

The Department advised us by letter dated June 27, 1974, that it agreed with our recommendations and is taking action to implement them. (See app. I.)

LEAA is developing evaluation guidelines which emphasize using evaluation results in management decisions and is preparing supporting materials to enable the States to implement the guidelines and the regional offices to oversee their efforts. The Department believes it is appropriate and necessary for LEAA to establish specific evaluation requirements to fulfill as a condition of the receipt of block grant funds by the States to insure proper management and accountability at the State level.

LEAA also intends to (1) systematically assess the operation and impact of selected criminal justice programs, (2) develop evaluation methodologies appropriate for assessing the effectiveness of criminal justice programs, and, (3) arrange for and monitor evaluations of national programs. In addition, it intends to implement a management evaluation program that will require all LEAA components to periodically

assess the results of their activities as well as to develop systematic monitoring efforts and intensive evaluations in those areas where more detailed and conclusive information is needed for planning.

LEAA also agreed to disseminate our report to the States because it believed such action would add credence to its new emphasis on evaluation.

In summary, the Department's response indicates that LEAA is taking action to meet the evaluation needs identified in our report.

California

The Administrator of the California Office of Criminal Justice Planning advised us of numerous steps the State intends to take to develop more effective evaluations. (See pp. 16 and 17.) These actions indicate that California is committed to trying to use evaluations to improve its criminal justice planning and resource allocation.

Michigan

The Administrator of the Michigan Commission on Criminal Justice commented that "within the existing accepted understanding of evaluation today, this report is valid." However, he also emphasized that evaluation of the LEAA program is only one of several competing concerns expressed by the Congress and critics of the program. He stated that "the States are criticized for not being practical in awarding the money where it is needed." The States, he said, are faced with competing concerns of

--"controls versus excessive red tape,

--"block grants versus categorical grants,

--"decentralization of responsibility versus responsibility for outcome,

--"information and data availability versus security and privacy,

--"substantive concerns versus procedural concerns, and

--"the speed of expenditures versus national expenditures."

Thus, he believed it would be unfair to represent evaluation as the single, uppermost concern of the Congress regarding the LEAA program.

He also pointed out that evaluation is difficult and extremely costly, that "the causes of crime remain unknown in any real sense, and that cause and effect measurement is nearly impossible in regard to crime." He stated that evaluation is further complicated by

"administrative requirements, the inherent conflicts within the Act, the difficulty of cost benefit analysis, the competing demands for time and money within this program, the limited value of the result of evaluation, the scope of the problem of crime versus the scope of the problem in dollar amounts, and the extent to which political factors are involved in the entire process."

He had no objection to our report's recommendations, but believed they would have little impact on the program. He believed that "all outcome evaluation, as contemplated by this report, [should] be conducted by LEAA rather than the States." LEAA should have responsibility for "technical assistance, audits, program monitoring, evaluation and research." LEAA "should be removed from the substantive crime control program except as it relates to the provision of Federal law enforcement services."

There is no doubt that evaluation is complicated by some of the factors noted by the Michigan Administrator and that other matters are important. The consequence of not doing such evaluations however is to reduce the planning process to chance. Evaluations are necessary so more effective decisions can be made regarding the allocation of resources.

The Congress has clearly expressed its intent that the LEAA program be evaluated. It has also made it clear that the States are an integral part of the LEAA program and should share program responsibilities with LEAA. Accordingly we do not agree with the Michigan Administrator that only LEAA should have responsibility for such functions as evaluation. The States must also be willing to accept such responsibilities if they want to use LEAA funds.



UNITED STATES DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20530

Address Reply to the
Division Indicated
d Refer to Initials and Number

JUN 27 1974

Mr. Daniel F. Stanton
Assistant Director
General Government Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Stanton:

This letter is in response to your request for comments on the draft report titled, "Progress in Determining Types of Approaches Which Work in the Criminal Justice System."

Generally, we are in agreement with the report and share GAO's concern regarding the need for effective evaluation of programs and projects funded by the Law Enforcement Assistance Administration (LEAA). Although the report acknowledges that LEAA has undertaken several initiatives in evaluating its programs, it does not comment on many of the evaluative research projects funded by LEAA during the years 1969-1973 which have contained evaluative, assessment, or comparative research dimensions. In most cases, these projects entailed both the development and evaluation of programs to improve law enforcement and the administration of justice, with the intensity of evaluation varying from project to project. A summary cataloguing these efforts has been prepared by LEAA and is available for review and consideration by the GAO.

As we have previously indicated in responses to other GAO reports, it has become increasingly clear to us that there is a definite need to assess the effectiveness of LEAA's programs in achieving their objectives. This need was also clearly recognized by Congress in its hearings on the Crime Control Act of 1973. In response to this need and the Congressional mandate for effective evaluation, LEAA took several steps in the fall of 1973 to develop a more effective evaluation capability. It established an Office of Evaluation and delegated to it responsibility for fulfilling LEAA's responsibilities and needs with

APPENDIX I

respect to evaluation. Perhaps more significantly, the Administrator created an Evaluation Policy Task Force in November of 1973 and charged it with developing an evaluation program to generate information to meet the needs of all participants in the LEAA program. Consisting of representatives from the State Planning Agencies and all components of LEAA, the Task Force submitted its report on schedule in March of 1974.

Working from the recommendations of the Task Force, LEAA is developing an evaluation program which, when coordinated with the evaluation efforts of the states, promises to meet all of the evaluation needs identified in the GAO report. The goals of the LEAA Evaluation Program will be those recommended by the Evaluation Policy Task Force:

- to obtain and disseminate information on the cost and effectiveness of various approaches to solving crime and criminal justice problems.
- to have performance information used at each LEAA administrative level in planning and decision-making in order to assist program managers achieve established goals.
- to help state and local criminal justice system units realize the benefits of utilizing evaluation as part of their management system.

The report recommends that LEAA issue guidelines requiring states to include a section in their State plans that discusses (1) how State Planning Agency (SPA) management views that it can use evaluations to attain its goals by furnishing information, analyses, appraisals and recommendations pertinent to its duties and objectives, and (2) the extent to which the state believes its current evaluation strategy needs modifying so management can realize benefits intended by evaluations.

LEAA considers the recommendation to be appropriate and implementing action has been initiated. We have circulated a set of proposed guidelines which are almost ready for clearance outside the agency in accordance with the requirements of OMB Circular No. A-95. The guidelines place a major emphasis on the use of evaluation results in management decisions. Also, we are in the process of preparing supporting materials to enable the states to implement the guidelines and the Regional Offices to oversee their efforts. Further, two publications that address alternative structures for SPA monitoring systems and more sophisticated evaluation efforts are in the process of development.

We feel that the LEAA role of establishing specific evaluation requirements to be fulfilled as a condition of the receipt of block grant funds by the states is both appropriate and necessary to insure proper management and accountability at the state level. Thus, we are proposing more detailed and comprehensive evaluation requirements for FY 1975. These requirements should increase the number and quality of evaluation activities carried out by the states. With LEAA serving in a coordinating role and providing guidance and assistance to the states, we can expect a more coherent evaluation program at the state level. As part of this coordinated effort, LEAA will:

- become thoroughly familiar with the evaluation activities and plans of each of the 50 states.
- by means of a "circuit rider" approach, maintain personal contact with the evaluation units in each of the 50 states.
- develop and maintain a resource pool of qualified criminal justice evaluators in all areas of criminal justice. This pool will be a resource for the states as well as national and regional LEAA offices.
- develop and maintain a reference list of criminal justice evaluations completed and in process. This also will be tapped by both state SPAs and national and regional LEAA offices when seeking evaluative information.
- provide an active communications link among states seeking information about alternative evaluation systems in other states, funding options for evaluation, interpretations of evaluation requirements and guidelines, evaluation training sessions, etc.
- arrange and support training sessions for national, regional, and state evaluation personnel.
- assess the evaluation needs of the states on a continuing basis and develop recommendations for LEAA action with respect to those needs.
- establish a mechanism for ensuring that the results of LEAA evaluations are communicated to all parties whose programs and activities are potentially affected by them.

APPENDIX I

In addition, under the Evaluation Program, LEAA will (1) systematically assess the operation and impact of selected criminal justice programs supported under the Omnibus Crime Control and Safe Streets Act of 1973, (2) develop evaluation methodologies appropriate for assessing the effectiveness of criminal justice programs, and (3) arrange for and monitor evaluations of national programs.

Clearly, the tasks outlined above are important in operating an efficient and comprehensive LEAA evaluation effort at all levels. LEAA intends to play a key coordinating role in its overall evaluation efforts and will provide much needed liaison services with the states.

In addition to the evaluation program outlined above, LEAA intends to implement a management evaluation program that will require all components of LEAA to periodically assess the results of their activities as well as the results of the projects they support. The program also requires a systematic monitoring effort and intensive evaluations in those areas where more detailed and conclusive information is needed for planning purposes. Essentially, the program applies the same evaluation guidelines to all LEAA offices as will be applied to the states. This reflects LEAA's belief that evaluation is a basic management tool the use of which should not be limited to particular projects.

The report also recommends that LEAA disseminate GAO's report to the states so they will be aware of the need to do outcome evaluations that can be and are used in making decisions.

LEAA concurs with the recommendation and will initiate such action upon receipt of the final report from GAO. Such a report would most certainly add credence to our new emphasis on evaluation.

In summary, we would like to again emphasize that the new Administration of LEAA is committed to a management style which requires sound evaluation to provide accurate information for planning and funding decisions. Our recent actions, as described herein, to expand the role of evaluation within LEAA programs, demonstrates our determination to be responsive to the conditions highlighted by the report. We feel that the initiatives we are taking will not only fulfill

the Congressional mandate for evaluation, but also provide us with needed information about what works and doesn't work in the criminal justice system.

We appreciate the opportunity given us to comment on the draft report. Should you have any further questions, please feel free to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Glen E. Pommerening". The signature is stylized with a large, looping initial "G" and "P".

Glen E. Pommerening
Acting Assistant Attorney General
for Administration

APPENDIX II

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>
ATTORNEY GENERAL:		
William B. Saxbe	Jan. 1974	Present
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
ADMINISTRATOR, LAW ENFORCEMENT		
ASSISTANCE ADMINISTRATION:		
Richard W. Velde	Sept. 1974	Present
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

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