

GAO

Report to the Subcommittee on
Commerce, Justice, State, the Judiciary,
and Related Agencies, Committee on
Appropriations, U.S. Senate

July 1999

FEDERAL GRANTS

More Can Be Done to Improve Weed and Seed Program Management





G A O

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The Honorable Judd Gregg
Chairman
The Honorable Ernest Hollings
Ranking Minority Member
Subcommittee on Commerce, Justice,
State, the Judiciary, and Related Agencies
Committee on Appropriations
United States Senate

According to the Department of Justice (DOJ), the Weed and Seed Program is an important component of its crime prevention program as well as a major part of the Clinton Administration's comprehensive community revitalization strategy. Weed and Seed is a community-based, multiagency program that proposes to "weed out" crime from targeted neighborhoods, then "seed" the site with a variety of programs and resources to prevent crime from recurring. A central tenet of the program is for local Weed and Seed sites to develop partnerships with other federal, state, and local governments and private sector agencies to leverage federal Weed and Seed grant funds with additional resources from these partners to promote weeding and seeding activities. These additional resources are intended to help the sites achieve the goal of becoming self-sustaining without Weed and Seed grant funds.

This report responds to a requirement contained in the Senate report (105-235) accompanying the fiscal year 1999 Commerce, Justice, State, the Judiciary, and Related Agencies' appropriations bill. This report also reviews the efficiency and effectiveness of the Weed and Seed Program. Specifically, this report assesses how (1) the program is managed by DOJ's Executive Office for Weed and Seed (EOWS), (2) EOWS monitors local Weed and Seed sites to ensure that grant requirements are met, (3) EOWS determines when sites have become self-sustaining, and (4) EOWS and selected sites are measuring program results.

Results in Brief

EOWS has not established an adequate internal control requiring that significant program management decisions be documented.¹ Without this control, EOWS management has not always fully documented EOWS decisions, such as qualifying new and existing sites for funding. For example, in reviewing 12 of the 70 fiscal year 1999 new site qualification funding decisions, we found that for 5 of these 12 decisions, documentation was insufficient for us to determine how inconsistencies among external consultants and grant monitor recommendations and EOWS management decisions were reconciled. Without this documentation, it was impossible for us to determine the basis and rationale for these decisions. In fiscal year 1999, EOWS made decisions to qualify 164 of the existing 177 sites for continued funding, although in some cases, EOWS grant monitors recommended against additional funding. However, available documentation was insufficient for us to determine the basis and rationale for EOWS' deciding to qualify these sites for continued funding. For the remaining 13 sites that EOWS decided not to qualify for continued funding, documentation was sufficient to determine the basis and rationale for these decisions.

EOWS also did not always ensure that local Weed and Seed sites met critical grant requirements, such as the submission of progress reports. Progress reports are an important tool to help EOWS management and grant monitors determine how sites are meeting program objectives and to assist in making future grant qualification decisions. Almost one-half of the 177 sites funded in fiscal year 1998 had not submitted all of the required progress reports. In addition, while EOWS is to conduct monitoring visits of all Weed and Seed sites to determine the sites' compliance with grant requirements, EOWS grant monitors did not always document the results of these visits. Documentation of these visits is an important tool for EOWS grant monitors to convey to EOWS management officials how well sites are complying with grant requirements and for EOWS to use in making existing site funding qualification decisions.

EOWS has not developed criteria to determine when sites have become self-sustaining and when to reduce or withdraw Weed and Seed funds, even though the goal of sites' becoming self-sustaining is central to the program. While we identified actions that selected sites had taken toward self-sustainment, at the time of our review, no site's funding had been

¹The Comptroller General's guidance on internal controls in the federal government, [Standards for Internal Controls in the Federal Government](#), requires that these systems and all transactions and significant events are to be clearly documented, and that the documentation is to be readily available for examination.

reduced or withdrawn as a result of its efforts to become self-sustaining during the 9 years of the program's existence.

EOWS' performance indicators generally did not measure program results. While our review was in progress, EOWS changed some of its performance indicators in an attempt to better measure how well sites were meeting program objectives. However, the revised indicators still primarily tracked program activity rather than results. For example, EOWS tracked the number of people who attended tutorial programs rather than assessing program results, such as attendees' academic improvements. Despite the general lack of performance indicators, most local officials with whom we spoke commented favorably on the activities funded by the local Weed and Seed sites. They believed that a key ingredient to the Weed and Seed Program's success was the commitment of the mayors' and U.S. Attorneys' offices and civic and business leaders.

We make recommendations in this report to (1) strengthen EOWS' management control over qualifying new and existing sites for funding and site monitoring, (2) develop criteria to determine when EOWS should reduce or withdraw program funding from self-sustaining sites, and (3) develop additional performance measures that better track program outcomes.

Background

The Weed and Seed Program is a DOJ discretionary grant program that provides funding to community grantees to help prevent and control crime and improve the quality of life in targeted high-crime neighborhoods across the country.² It is a joint federal, state, and local program for coordinated law enforcement and neighborhood reinvestment. Program funding is to support Weed and Seed grantee neighborhood sites and to provide training and technical assistance.

The Weed and Seed Program has grown dramatically since it began in fiscal year 1991 with three pilot sites³ and a relatively small investment of federal resources. For example, between fiscal years 1995 and 1998, the number of Weed and Seed sites increased from 36 to 177, while the total annual program budget increased (in constant 1998 dollars) from about \$34 million to \$43 million. In addition, during the same time period, the

²EOWS officials said that the Weed and Seed Program is not a typical, discretionary grant program but a community-based, multiagency approach or strategy that proposes to weed out crime from targeted neighborhoods, then seed the site with a variety of programs and resources to prevent crime from recurring. A grantee may have more than one site.

³The Weed and Seed fiscal year 1991 pilot sites were Kansas City, MO; Omaha, NE; and Trenton, NJ.

average grant awarded per site decreased (in constant 1998 dollars) from about \$786,000 to \$260,000. In fiscal year 1999, with a budget of \$49 million, DOJ plans to award grants to about 200 Weed and Seed sites. See appendix I for a map showing the locations and numbers of Weed and Seed sites funded in fiscal year 1998.

EOWS is responsible for the national management and administration of the Weed and Seed Program, including developing policy and providing federal guidance and oversight. EOWS currently administers the Weed and Seed Program with a staff of 4 management officials, 12 grant monitors, 7 support staff, 2 detailees, 3 contractors, and 4 interns.

Before interested communities can apply for a Weed and Seed grant, they must first be approved for official recognition by EOWS. Official recognition requires the U.S. Attorney in the area where the Weed and Seed site is to be located to organize a local steering committee. The steering committee, which can be made up of various federal, state, and local representatives, including residents, is responsible for local administration of the program. For official recognition, a site is also required to develop a management plan, engage residents and other partners in its activities, and develop a comprehensive strategy to weed out crime and gang activity and to seed the area with social services, economic services, and economic revitalization.

The four required elements of the Weed and Seed Program are (1) law enforcement; (2) community policing; (3) crime and substance prevention, intervention, and treatment; and (4) neighborhood restoration. According to EOWS, law enforcement should attempt to eliminate the most violent offenders by coordinating and integrating the efforts of federal, state, and local law enforcement agencies in targeted high-crime neighborhoods. The objective of community policing is to raise the level of citizen and community involvement in crime prevention and intervention activities. Crime and substance abuse prevention, intervention, and treatment should include youth services, school programs, community and social programs, and support groups. Finally, neighborhood restoration should focus on distressed neighborhoods through economic and housing development. Weed and Seed sites fund a variety of law enforcement and community activities. For example, law enforcement-funded activities ranged from participation in a multijurisdictional, interagency, antidrug task force to conducting bike and foot patrols in the community.

Scope and Methodology

To assess how EOWS manages the Weed and Seed Program, we reviewed (1) the criteria used to determine which new and existing sites should be qualified for funding and (2) the policies and guidance that EOWS provides to applicants. To gather this information, we interviewed officials from DOJ and EOWS and reviewed pertinent documents, including guidance set forth in the Weed and Seed Program Implementation Manual, official recognition and grant applications, and budget reports. In addition, we judgmentally selected 12 of 70 fiscal year 1999 official recognition files for review. These 12 files included 3 files from each of the 4 categories that EOWS used in making their official recognition determinations. Further, we reviewed the fiscal year 1999 qualification funding decisions for the 177 sites that were in existence in fiscal year 1998.

To assess how EOWS monitors grant use, we reviewed EOWS program grant guidance, the EOWS monitoring guide to be used by grant monitors when conducting site visits, and the grant files for the five Weed and Seed sites that we visited: Atlanta, GA; Dyersburg, TN; Philadelphia, PA; San Diego, CA; and Woburn, MA. We judgmentally selected these 5 sites from the 177 sites funded in fiscal year 1998 (1) to obtain a mix of geographic locations, populations, and lengths of time in existence and (2) on the basis of our discussions with EOWS management. These locations were not selected to be representative of all Weed and Seed sites. We also reviewed selected site visit monitoring reports prepared by grant monitors for these sites and quarterly financial status reports and biannual progress reports submitted in fiscal year 1998. We interviewed EOWS management officials, grant monitors, and coordinators at these five sites regarding procedures used for monitoring Weed and Seed sites.

To assess how EOWS determines when sites have become self-sustaining and how EOWS and selected sites are measuring the success of their Weed and Seed activities, we performed site visits at the five Weed and Seed locations previously cited. We also surveyed, by mail, the 87 sites that had been awarded Weed and Seed grants since September 30, 1996. We received usable responses from 74 of the 87 sites, or 85 percent.

Our questionnaire asked Weed and Seed site coordinators to provide current information, by January 29, 1999, about their sites, such as (1) actions taken to become self-sustaining, (2) partnerships or cooperative arrangements established with other entities, and (3) performance indicators used to measure the sites' success. See appendix II for a copy of the questionnaire, including responses.

In developing the questionnaire, we asked EOWS management officials to review several drafts of the document. In addition, we pretested the questionnaire by telephone with several Weed and Seed site coordinators. We conducted the survey from January to April, 1999.

To determine the performance indicators currently in place and their adequacy in measuring program success, we interviewed officials from EOWS and the five sites that we visited. We also reviewed pertinent documents, including EOWS policies and guidance, grant applications, and data collected pursuant to the Government Performance and Results Act of 1993 (GPRA)⁴ and from our survey results.

We requested comments on a draft of this report from the Attorney General of the United States and the Director of the Executive Office for Weed and Seed. On June 23, 1999, we met with the Deputy Assistant Attorney General and Comptroller, Office of Justice Programs (OJP), and the Director, EOWS, and members of his staff to discuss the draft report. The Assistant Attorney General provided written comments on the draft report on July 1, 1999, which are discussed near the end of this letter and reprinted in appendix IV.

We did our audit work between October 1998 and May 1999 in accordance with generally accepted government auditing standards.

EOWS' Internal Control Weakness Hampers Weed and Seed Program Management

EOWS does not have an adequate internal control requiring that new and existing site qualification for funding decisions always be fully documented. Because of this, EOWS cannot ensure that it is making the best allocation of available funds when it makes these decisions.

The Comptroller General's guidance on internal controls in the federal government, Standards for Internal Controls in the Federal Government, requires that these systems and all transactions and significant events are to be clearly documented, and that the documentation is to be readily available for examination. Documentation of transactions or other significant events should be complete and accurate and should facilitate tracing the transaction or event and related information from before it occurs, while it is in process, to after it is completed.

⁴The Government Performance and Results Act of 1993, P.L. 103-62, seeks to shift the focus of federal management and decisionmaking away from concentrating on the activities performed to a focus on the results of those activities that are undertaken.

New Site Funding Qualification Decisions Were Not Always Documented

EOWS' new site funding qualification decisions were not always fully documented. EOWS management officials were able to provide us with some documentation for 12 of the 70 fiscal year 1999 new site funding qualification decisions we reviewed. However, for 5 of these 12 decisions we identified inconsistencies between the documentation and the decisions. The available documentation was insufficient for us to determine how these inconsistencies were reconciled. Therefore, we could not determine the basis and rationale for these five decisions.

The first step in the new site funding qualification process is for EOWS to officially recognize a site's eligibility to apply for formal involvement in the Weed and Seed Program. According to EOWS management officials, in fiscal year 1999, they created a new official recognition process, which evolved from approving all applicants, to creating a competitive process under which all applicants would not be approved. As part of this new process, EOWS management officials said they were to consider recommendations made by external consultants and EOWS grant monitors. They also were to consider the number of sites already funded within the U.S. Attorney's district, the extent of support provided by that U.S. Attorney's office to those sites, and insights obtained from the U.S. Attorneys for applications that met or almost met all official recognition requirements.

For fiscal year 1999, EOWS received applications for official recognition from 70 potential sites, and it approved 27 sites. The 27 sites were invited to apply for fiscal year 1999 funding contingent upon the completion of all official recognition requirements.

We reviewed 12 of the 70 fiscal year 1999 official recognition files, and, for 5 of the site qualification decisions, we identified inconsistencies among the external consultant recommendations, grant monitor recommendations, and EOWS management decisions. The available documentation was insufficient for us to determine how these inconsistencies were reconciled. Therefore, we could not determine the basis and rationale for the decisions. For example, documentation for two of the files showed that the external consultants and EOWS grant monitors had recommended that the sites not be officially recognized, but EOWS management had approved the sites. According to EOWS management officials, these approvals were granted on the basis of additional information provided by the local U.S. Attorneys; however, this additional information was not documented by EOWS.

Funding Qualification Decisions Were Not Always Documented

EOWS did not always fully document how it made its decisions on whether to qualify the 177 existing sites for continued funding and special project⁵ funding. Although EOWS officials could provide us with documentation for some of the information considered for existing sites, such as unspent grant award balances and compliance with reporting requirements, this documentation was not sufficient for us to determine the basis and rationale for the decisions to qualify 164 of the 177 existing sites for continued funding. EOWS, however, documented the basis and rationale for the 13 sites that it decided to disqualify for continued funding. In addition, EOWS could not provide us with documentation regarding how it made its special project funding qualification decisions.

Since fiscal year 1991, the total annual Weed and Seed Program's budget has increased (in 1998 constant dollars) from about \$589,000 to about \$49 million. In addition, the number of Weed and Seed Program grant awards has grown dramatically since fiscal year 1995, while the average grant has decreased substantially. For example, in fiscal year 1995, EOWS awarded grants to 36 sites, with an average grant of about \$786,000 (in 1998 constant dollars). In fiscal year 1998, however, EOWS awarded grants to 177 sites, with an average grant award of \$260,000. See table 1 for fiscal years 1991-99 data on the Weed and Seed Program, including EOWS budget and average site funding history.

⁵Special projects include Mobile Community Outreach Police Stations (MCOPS), the Kids Safe Program, and Kids House. EOWS describes MCOPS as a way to enhance the community-policing mission of the Weed and Seed Program by using MCOPS as a community meeting place to offer health, welfare, and public safety programs. The Kids Safe Program is administered by DOJ's Office of Juvenile Justice and Delinquency Prevention and attempts to reduce child abuse and neglect and prevent delinquency in communities. EOWS describes Kids House, which is implemented by the Urban Family Institute, as a safe, family-like environment run by volunteers where children can go when they are not in school.

Table 1: Weed and Seed Site Funding History for Fiscal Years 1991-99 (1998 Constant Dollars)

Fiscal year	Appropriation budget	Asset forfeiture budget ^a	Combined EOWS appropriation and asset forfeiture budget		Number of funded sites	Average site funding ^b
1991	\$589,120	\$0	\$589,120		3	\$196,759
1992	12,973,319	0	12,973,319		20	800,451
1993	14,865,885	0	14,865,885		21	680,571
1994	24,839,056	8,990,277	33,829,333		36	804,721
1995	24,587,002	9,433,962	34,020,964		36	786,164
1996	29,320,988	9,259,259	38,580,247		87	349,794
1997	28,787,879	9,090,909	37,878,788		118	232,323
1998	33,500,000	9,000,000	42,500,000		177	260,000
1999	40,000,000	9,000,000	49,000,000		200 ^c	200,000 ^c

^aMost sites also received asset forfeiture funds for the payment of various costs incurred by state and local law enforcement officers participating in joint law enforcement operations with federal agencies.

^bDoes not include additional funding allocations, such as EOWS' salaries and expenses, technical assistance and training, and travel costs.

^cNumber of funded sites and average site funding is estimated.

Source: EOWS data.

For fiscal year 1999, EOWS management officials decided for the first time not to qualify for funding all existing sites that met grant requirements. In fiscal year 1999, EOWS decided to disqualify for funding 13 of the 177 sites that were funded in fiscal year 1998. EOWS officials developed a site analysis matrix to assist them in deciding which sites to qualify for funding. This matrix contained information about all 177 sites, such as unspent grant award balances over \$350,000 and each site's compliance with DOJ's reporting requirements. According to EOWS management officials, in making their final decisions they also considered the recommendations made by EOWS grant monitors and their own personal knowledge of the sites. For the 13 sites that were disqualified for funding in fiscal year 1999, EOWS documented the basis and rationale for these decisions by sending a letter to each site describing the reasons for its decision.

However, from our review of the available documentation for the remaining 164 sites, this documentation was insufficient to determine the basis and rationale for these qualification decisions. For example, in fiscal year 1999, one site was qualified for funding even though it had a grant award balance of over \$350,000 and the EOWS grant monitor had recommended that the site not receive funding. Two other sites were also qualified for funding for fiscal year 1999 even though they had grant award balances over \$350,000 and had not filed all of the required financial and

progress reports. Further, the EOWS grant monitor recommended that one of these sites not receive fiscal 1999 funding due to its delays in spending its first two awards. According to his report, “the grantee is so far behind that a year without funding will allow them to catch up and be on track again.” EOWS management officials told us their decisions to qualify these sites for funding was based on their personal knowledge of these sites’ activities. However, we were not able to determine the basis and rationale for these decisions because they were not documented in the information provided to us by EOWS.

EOWS has also qualified existing sites to receive funding for special projects. For example, in fiscal year 1998, EOWS qualified sites for funding of \$1,043,334 for the Mobile Community Outreach Police Stations (MCOPS); \$1,000,000 for the Kids Safe Program; and \$539,797 for Kids House. Since written procedures for qualifying sites for special projects had not been developed and the basis and rationale for these decisions had not been documented, we could not determine how these decisions were made. EOWS management officials told us that they made these decisions on the basis of what they perceived as the needs of particular Weed and Seed sites after contacting the sites and speaking with EOWS grant monitors.

See table 2 for a summary of EOWS’ funding allocations for fiscal year 1998.

**Table 2: EOWS Fiscal Year 1998
Funding Allocations**

Funding	Amount
Weed and Seed sites	\$42,668,936
Special projects	3,926,130
1998 carryover	2,088,058
Travel expenses	1,344,963
Executive Office for U.S. Attorneys	966,846
Salaries and expenses	889,000
Technical assistance and training	874,699
Conferences	773,213
Congressional earmark	190,000
Other	53,973
Total	\$53,775,818^a

^aIn addition to the fiscal year 1998 EOWS grant and asset forfeiture budget amount, EOWS’ total budget included an unobligated balance carryover from fiscal year 1997 of \$11,275,818.

Source: EOWS data.

EOWS Did Not Ensure That Weed and Seed Sites Met Grant Requirements

EOWS did not always ensure that local Weed and Seed sites complied with critical grant requirements. For example, on the basis of our review of the site analysis matrix provided to us by EOWS, almost one-half of the 177 existing sites that were funded in fiscal year 1998 had not submitted all of the required progress reports. In addition, EOWS grant monitors did not always document the results of their site visits as required by EOWS guidance.

EOWS requires semiannual progress reports describing site activities during the reporting period and the status or accomplishment of program objectives. According to EOWS officials, progress reports are an important tool to help EOWS management officials and grant monitors determine how sites are meeting program objectives and to assist them in making future grant qualification decisions.

Our review of the EOWS site analysis matrix showed that as of December 1998, 80, or 45 percent, of the 177 sites had not submitted these required progress reports. In addition, EOWS requires the sites to provide program data, such as crime statistics and safe haven program attendance, to assess program results. Our review of the EOWS site analysis matrix showed that as of December 1998, 20, or 11 percent, of the 177 sites had not submitted the required data.

Further, according to the EOWS' monitoring guide, grant monitors are to conduct site visits every 18 months and monitor Weed and Seed sites' compliance with grant requirements through desk reviews, technical assistance, and telephone contacts on a continuing basis. The guide instructs grant monitors to prepare a site visit report. According to EOWS officials, documentation of these visits is an important tool for EOWS grant monitors to convey to EOWS management officials how well sites are complying with grant requirements and EOWS to use in making existing site funding qualification decisions.

According to EOWS management officials, the grant monitors have not always documented their site visits due to the large number of sites they are responsible for monitoring—as many as 23 sites per monitor. EOWS management officials said that they hired four additional grant monitors in fiscal year 1999, which should decrease the number of sites that each grant monitor is responsible for monitoring.

EOWS Lacks Criteria on Continued Funding for Sites That Become Self-Sustaining

An important goal of the Weed and Seed is the self-sustainment of local Weed and Seed sites through the leveraging of additional resources from non-EOWS sources. However, EOWS has not developed criteria to determine (1) when sites have become self-sustaining and (2) when to reduce or withdraw Weed and Seed grant funds. Although many grantees have received Weed and Seed funding for several years, EOWS has not reduced or withdrawn any Weed and Seed grantee's funds because of progress their site's had made toward the goal of becoming self-sustaining. Although EOWS does not know what progress sites have made toward self-sustainment, most of the sites we visited and surveyed reported making efforts toward that goal.

EOWS Has Not Determined When Sites Become Self-Sustaining

While self-sustainment is an important goal of the Weed and Seed Program, EOWS has not developed specific criteria to determine when sites have become self-sustaining or determined the progress sites had made toward achieving this goal. The EOWS Executive Director and EOWS documents stated that a critical goal of the program is for sites to become self-sustaining by leveraging Weed and Seed grant funds with resources from other public and private sources. In 1995, the DOJ Inspector General reported that the Weed and Seed Program was founded on the premise that federal funding would continue for a finite period after which a Weed and Seed site would be self-sustaining.

We identified partnerships at each of the five sites we visited that resulted in the leveraging of additional resources for these sites. For example, at one site, the city police department and the city school system each provided a staff member to fill Weed and Seed administrative positions as a part of their other duties so that Weed and Seed funds could be used for other purposes and not spent on funding for administrative positions. At another site, a local business donated computers to be used in computer classes for children.

Most of the sites that responded to our survey indicated that they had developed partnerships and arrangements with other groups to move toward the goal of becoming self-sustaining. Of the 74 sites responding to our survey, 72 indicated that they had developed partnerships or cooperative arrangements with other government or nongovernment groups. For example, 59 sites responded that they had developed partnerships with local government agencies, while 54 indicated that they had developed such arrangements with nonprofit agencies.⁶ Some

⁶These numbers add to more than 76 because respondents were allowed to identify more than 1 partnership.

respondents reported establishing partnerships with various groups, such as the Department of Housing and Urban Development, a state public health department, city parks and recreation departments, and local businesses.

EOWS Has Not Determined When to Reduce or Withdraw Weed and Seed Funds

EOWS does not have criteria for determining whether or the extent to which a site has become self-sustaining and whether funds could be reduced or withdrawn. EOWS management officials said that, to date, no site's funding has been reduced or withdrawn as a result of the site's efforts to become self-sustaining. In addition, these officials said that they were reluctant to reduce or withdraw funding because of a concern that sites may not continue to implement the Weed and Seed Program.

Although EOWS has not developed criteria to reduce or withdraw sites' funding if they were to become self-sustaining, EOWS management officials said that beginning in the Year 2000, they would require sites⁷ to reapply for official recognition every 5 years and would encourage them to expand to additional sites. According to EOWS management officials, this new policy, which was made during the course of our review, is intended to determine whether sites still need funding. To obtain official recognition, sites must describe intended partnerships with other federal, state, and local governments and private sector agencies to leverage additional resources. For example, a site would be required to stipulate the level of resources that are committed by its partners. However, without criteria to determine when sites become self-sustaining, EOWS does not have a basis or rationale for determining when to reduce or withdraw sites' funds.

EOWS and Weed and Seed Sites' Performance Indicators Generally Did Not Measure Program Success

EOWS has developed various performance indicators, in an attempt to respond to GPRA. GPRA seeks to shift the focus of federal management and decisionmaking away from activities performed, to focusing on results or outcomes of activities undertaken. However, the indicators EOWS used to measure the success of the Weed and Seed Program still generally track activities rather than results or outcomes. Weed and Seed sites also used other indicators to measure the results of their individual programs, but these indicators also primarily measured activities, not outcomes. While the performance indicators were generally not sufficient to adequately measure program results, most of the local officials and residents with whom we spoke during our site visits were very satisfied with the activities funded by the local Weed and Seed programs.

⁷Technically, it is the community grantee that reapplies for official recognition, not the site.

Weed and Seed Indicators Generally Measure Activities, Not Results

In an attempt to measure the results of sites' weeding efforts, EOWS tracks law enforcement information, such as community-policing activities. EOWS requires each site to have a community-policing component to its program. Community policing involves law enforcement working closely with community residents to develop solutions to violent and drug-related crime and serves as a stimulus for community mobilization. Before 1999, EOWS tracked officer duty time spent in the Weed and Seed area; the percentage of police officer duty hours funded by Weed and Seed; certain serious crimes, such as violent and property crimes; and the number of arrests. Recently, EOWS management officials decided to eliminate the reporting of all of these crimes, except for homicides, because they believed that doing so would improve the accuracy and reliability of the data reported by reducing the amount of data collected by Weed and Seed sites.

In addition, EOWS currently requires sites to report whether they have (1) foot patrols, (2) bike patrols, (3) police substations, (4) crime watches, and (5) police participation in community meetings. Although these indicators are useful in tracking the types of weeding activities engaged in at the local sites, they generally do not measure outcomes.

To measure the results of seeding activities, EOWS tracks safe haven program attendance. Before 1999, EOWS tracked the total number of people who attended the safe haven program over a 6-month period, but EOWS recently reduced the tracking period to 1 week a year.

EOWS management officials said that they made the above changes to better measure the results of both weeding and seeding activities. However, these indicators still generally measure activities rather than results. For example, EOWS tracks the number of people who attended safe havens rather than assessing program results from these safe havens, such as attendees' academic improvement after completing a tutoring program provided at the safe haven.

The responses to our survey also show that the performance measures used by individual sites generally tracked activities, not results. While most sites reported that they have their own measures of success, these measures varied widely, including counting the number of newspaper articles about their Weed and Seed site and recording the number of drug-related cases prosecuted. The three most commonly reported measures of success by survey respondents were crime statistics, the number of participants in Weed and Seed-sponsored activities, and the level of community involvement. Further, 12 sites conducted surveys to gain the

perspective of community residents, and 4 sites reported on recidivism rates.

Using crime statistics and recidivism rates as performance measures could be useful. However, these measures can also present some methodological challenges because it is difficult to draw a direct causal link between crime or recidivism rates and Weed and Seed Program activities. For example, other explanations for crime rate fluctuations, such as economic trends and other law enforcement initiatives, could also be responsible for the observed outcomes. Therefore, if these measures are used, any analysis that attempts to draw the causal link should attempt to control for alternative explanations. From the information provided to us by Weed and Seed sites, it remains unclear whether sites that measure crime and recidivism rates controlled for other factors that may have contributed to changes in these rates.

A recently released study was conducted by Abt Associates Inc.⁸ for DOJ on the effectiveness of the Weed and Seed Program. This study involved eight Weed and Seed Program sites and, among other activities, attempted to measure crime trends at each site. Overall, the study indicated mixed results across the sites—there were significant favorable effects in the key outcome measures used in the Abt study for some cities and some time periods, while the results on outcome measures in other cities were not as favorable. The study acknowledged the difficulty in drawing a causal link and noted that the evidence is modest in terms of statistical significance.

Local Participants Reported Satisfaction With the Programs

Even though the performance indicators were not sufficient to adequately measure program results, most of the local officials with whom we spoke during our site visits were very satisfied with the activities funded by the local Weed and Seed programs. These officials, such as mayors, city administrators, U.S. attorneys, and high-ranking police officers, noted that the key ingredient to the Weed and Seed programs' success was the commitment of the mayors' and U.S. Attorneys' offices and civic and business leaders.

Local sites funded a wide variety of law enforcement and community activities to implement the Weed and Seed strategy. Law enforcement-funded activities ranged from participation in a multijurisdictional, interagency, violent crime task force to community bike and foot patrols. Community-funded activities ranged from sponsoring a Black History

⁸ National Evaluation of Weed & Seed, Cross-Site Analysis, Research Report, National Institute of Justice, June 1999.

Month program at a local high school to providing life-skills counseling to at-risk youths. During our visits to selected Weed and Seed sites, we observed many different types of activities. These activities ranged from community police substations or ministations to court-ordered community service for youths. Appendix III describes our site visits and illustrates the many types of activities funded at these sites.

Conclusions

Good internal controls are essential to achieving full accountability for the resources made available for the Weed and Seed Program. However, EOWS lacks an adequate internal control that requires that the basis and rationale for new and existing Weed and Seed site qualification for funding decisions always be fully documented. In addition, EOWS has not always ensured, through its grant monitoring process, that site progress reports—a grant requirement—were submitted or that grant monitors documented their site visits.

Through our survey and site visits, we identified some leveraging efforts made by Weed and Seed sites. Many of these efforts appeared to be leading toward the self-sustainment of some Weed and Seed sites. However, while the objective of sites' becoming self-sustaining is a critical program goal, EOWS had yet to establish criteria for determining when sites should be classified as self-sustaining and when to reduce or withdraw funding.

Although current performance measures address a variety of activities taking place at Weed and Seed sites, these measures generally are not adequate to judge program success. While EOWS has made some changes to the way that it measures program effectiveness, these indicators still generally track activities, not program outcomes. We recognize that it is difficult to precisely measure the results of this type of community-based program or strategy. However, better performance indicators as well as other indicators, such as compliance with grant requirements, would help EOWS make more informed program decisions, such as whether to continue funding existing sites.

Recommendations

We recommend that the Attorney General of the United States direct the Director of the Executive Office of Weed and Seed to

- develop an adequate internal control to ensure that the basis and rationale for new and existing site qualification for funding decisions are always fully documented;
- improve program monitoring to ensure that sites meet the grant requirement of submitting progress reports, and that EOWS site visits are documented;

-
- develop criteria for determining when sites are self-sustaining and when to reduce or withdraw program funding; and
 - develop additional performance measures that track program outcomes.

Agency Comments and Our Evaluation

DOJ generally agreed with most of the recommendations presented in the report and offered additional information to explain the status of the current situation, as well as additional actions it plans to take. DOJ also provided technical comments that we have incorporated as appropriate.

DOJ agreed with our recommendation for an adequate internal control to ensure that the basis and rationale for new and existing site qualification decisions are always fully documented. They provided some additional information on the internal controls for OJP's formal grant award processes. For example, they described processes currently in place to ensure that grants are awarded in accordance with Office of Management and Budget and OJP policies. While this information provided a framework for OJP financial controls, it did not specifically relate to our recommendation. Our internal control review focused on EOWS' decisions for qualifying new and existing sites for funding.

DOJ agreed with our recommendation to improve program monitoring, citing that it has a chronic problem of grantees not submitting programmatic progress reports in a timely manner. To address this problem, EOWS is proposing to suspend funding for grantees failing to submit progress reports in a timely manner. Because this new proposal has yet to be implemented by EOWS, we believe our recommendation to ensure that sites meet the grant requirement of submitting timely progress reports is appropriate. In addition, EOWS acknowledged the need to document all monitoring visits. After they received our draft report, they told us they had taken corrective action, and all monitoring reports are now up to date. However, there is no assurance that a process and procedures are in place to ensure that monitoring visits will always be documented, and we continue to believe that our recommendation is needed.

DOJ disagreed with our recommendation on self-sustainability, stating that developing criteria is problematic. They also commented that the draft report was incorrect in stating that no site's funding had been reduced or withdrawn as a result of the site's efforts to become self-sustaining, and that we used the terms "site" and "grantee" incorrectly. DOJ maintains that, as one neighborhood reached a point where it could sustain its Weed and Seed crime-reduction efforts, funds and resources were shifted by the grantee to other neighborhoods.

With respect to self-sustainability, there is a distinction to be drawn between DOJ's comments and evidence we gathered from interviews with program officials and our own observations. We acknowledge that some grantee funds and resources have been shifted to other neighborhoods within the grantee's location. However, it is not clear whether this occurred because the programs became less reliant on Weed and Seed grants or for other reasons. EOWS management and local program officials told us that funding had been reduced at some sites to fund activities in other neighborhoods, but not because the site demonstrated that it successfully reached self-sustainability. Our limited site visits confirmed this at the locations we selected for review.

In an attempt to create criteria for achieving self-sustainability, EOWS adopted a 5-year rule under which it can discontinue qualifying sites for continued program funding unless the sites expand to an additional neighborhood site. EOWS expressed the opinion that this rule has created an expectation of self-sustainability for current sites, since some funds are to be shifted from the current neighborhood site to the expansion site.

We continue to believe that EOWS needs to develop better criteria for determining when sites become self-sustaining and when to reduce or withdraw program funding. Under EOWS' current 5-year rule, even if some resources are shifted to an expansion site, there still may be substantial Weed and Seed investment at the original site and EOWS would have no way of knowing whether the original site is self-sustaining. Withdrawing funding after 5 years of federal investment without criteria could be arbitrary. Some sites may become self-sustaining sooner than 5 years—resulting in a missed opportunity to fund other Weed and Seed sites—while other sites may need more than 5 years to achieve self-sustainability. While it may be challenging to develop criteria for determining when a site becomes self-sustaining, we believe EOWS should work toward this goal since it is a central and fundamental tenet of the Weed and Seed Program.

With respect to the distinction between sites and grantees mentioned in EOWS' comments, we have modified the report to clarify when we are referring to a grantee or a site.

DOJ officials agreed with our recommendation to develop performance measures that track program outcomes. However, they noted that EOWS already has one performance measure in place—homicides—that it uses to track program outcomes. Consequently, they believed that our recommendation should be modified to state that EOWS should develop

and use additional performance measures. We recognize that EOWS has adopted this outcome-oriented performance measure and have modified our recommendation to require EOWS to develop additional measures.

DOJ also expressed concern that we did not include the results of a recently completed national evaluation of the Weed and Seed Program by Abt Associates Inc. As noted in Abt's report, this evaluation involved case studies of eight Weed and Seed sites. Among other activities, each case study included two principal sources of empirical data, as follows: (1) analysis of crime trends at each site and (2) surveys of site residents, one conducted in 1995 and the other in 1997. Overall, the report indicated mixed results across the sites—there were significant favorable effects in key outcome measures for some cities and some time periods, while the results on outcome measures in other cities were not as favorable. The report noted that the evidence is modest in terms of statistical significance.

Finally, DOJ stated that our report did not provide adequate insight into the findings of our site visits and mail surveys. However, in our results in brief section, we note the satisfaction that most local officials we spoke with had with the activities funded by Weed and Seed. These results are discussed in greater detail in the body of this report. Our survey results, in their entirety, are included as appendix II. In addition, the details of each of our five site visits are included in appendix III.

We are sending copies of this report to the Honorable Strom Thurmond, Chairman, and the Honorable Charles Schumer, Ranking Minority Member, Senate Subcommittee on Criminal Justice Oversight. We are also sending copies of this report to the Honorable Harold Rogers, Chairman, and the Honorable José E. Serrano, Ranking Minority Member, House Subcommittee on Commerce, Justice, State, the Judiciary, and Related Agencies; the Honorable Bill McCollum, Chairman, and the Honorable Robert C. Scott, Ranking Minority Member, House Subcommittee on Crime; and the Honorable Janet Reno, Attorney General. We will make copies available to others upon request.

The major contributors to this report are acknowledged in appendix V. If you or your staff have any questions on this report, please call me on (202) 512-8777.

A handwritten signature in black ink that reads "Richard M. Stana". The signature is written in a cursive style with a large initial "R" and a long horizontal flourish at the end.

Richard M. Stana
Associate Director, Administration
of Justice Issues

Contents

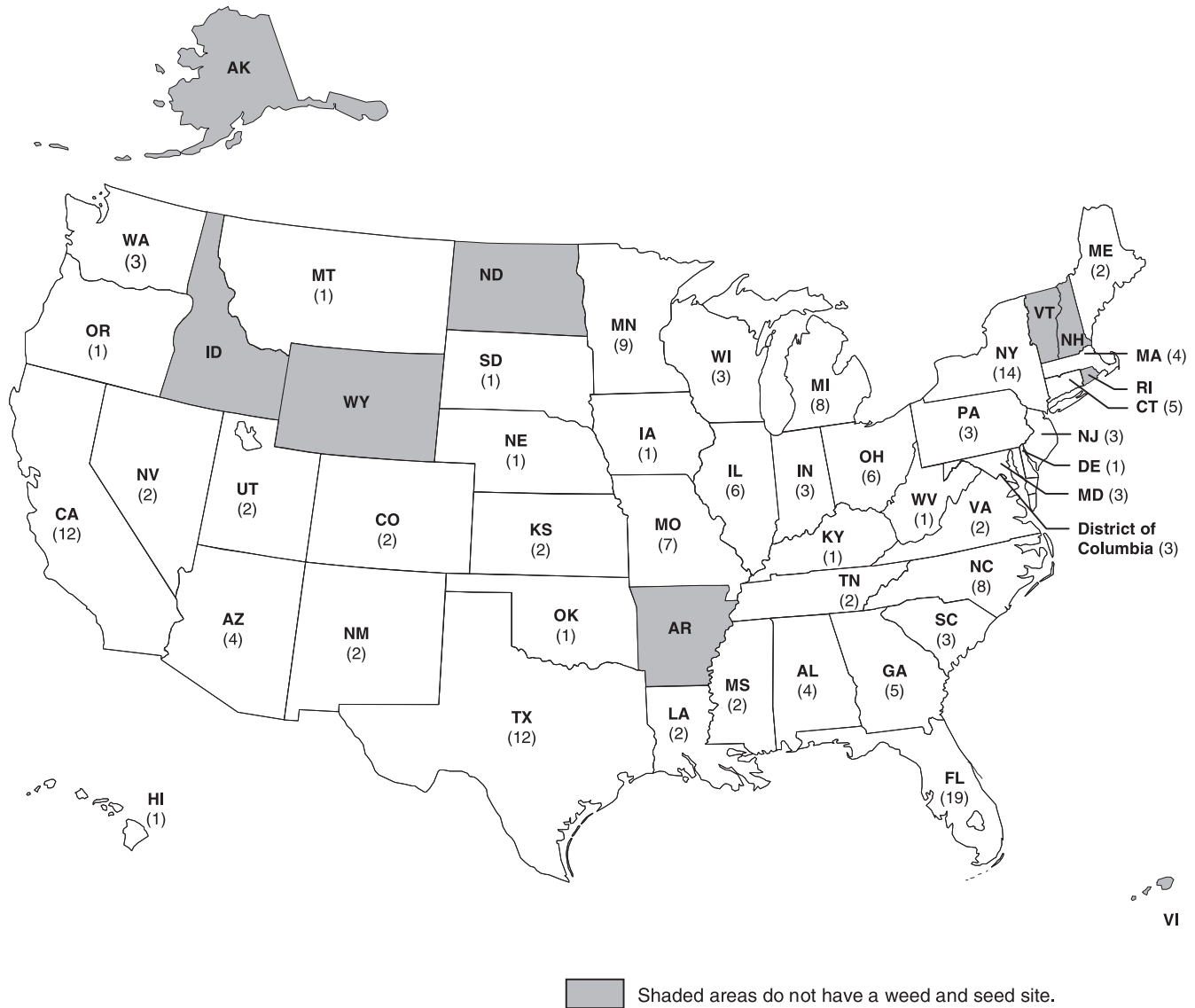
Letter		1
Appendix I		26
Locations and Numbers of Weed and Seed Sites Funded in Fiscal Year 1998		
Appendix II		27
U.S. General Accounting Office Survey of Weed and Seed Sites		
Appendix III		33
GAO Site Visit	Atlanta, GA	33
Summaries	Dyersburg, TN	38
	Philadelphia, PA	41
	San Diego, CA	45
	Woburn, MA	50
Appendix IV		54
Comments From the Department of Justice	GAO Comments	69
Appendix V		70
GAO Contacts and Staff Acknowledgments		
Tables	Table 1: Weed and Seed Site Funding History for Fiscal Years 1991-99 (1998 Constant Dollars)	9
	Table 2: EOWS Fiscal Year 1998 Funding Allocations	10

Table III.1: Atlanta Weed and Seed Site's Funding History—FY 1992-99 (1998 Constant Dollars)	34
Table III.2: Examples of Atlanta Weed and Seed Site's Funded Activities	35
Table III.3: Examples of Atlanta Weed and Seed Site's Leveraging Efforts	36
Table III.4: Dyersburg Weed and Seed Site's Funding History—FY 1996-99 (1998 Constant Dollars)	38
Table III.5: Examples of Dyersburg Weed and Seed Site's Funded Activities	39
Table III.6: Examples of Dyersburg Weed and Seed Site's Leveraging Efforts	40
Table III.7: Philadelphia Weed and Seed Site's Funding History—FY 1992-99 (1998 Constant Dollars)	42
Table III.8: Examples of Philadelphia Weed and Seed Site's Funded Activities	43
Table III.9: Examples of Philadelphia Weed and Seed Site's Leveraging Efforts	44
Table III.10: San Diego Weed and Seed Site's Funding History—FY 1992-98 (1998 Constant Dollars)	46
Table III.11: Examples of San Diego Weed and Seed Site's Funded Activities	47
Table III.12: Examples of San Diego Weed and Seed Site's Leveraging Efforts	48
Table III.13: Woburn Weed and Seed Site's Funding History—FY 1996-98 (1998 Constant Dollars)	50
Table III.14: Examples of Woburn Weed and Seed Site's Funded Activities	51
Table III.15: Examples of Woburn Weed and Seed Site's Leveraging Efforts	52

Abbreviations

ATF	Bureau of Alcohol, Tobacco and Firearms
CUNAD	Community of United Neighbors Against Drugs
DARE	Drug Awareness and Resistance Education
DEA	Drug Enforcement Administration
DEFY	Drug Education For Youth Mentoring Program
DOJ	Department of Justice
EOWS	Executive Office of Weed and Seed
FBI	Federal Bureau of Investigation
FY	fiscal year
GBI	Georgia Bureau of Investigation
GPRA	Government Performance and Results Act of 1993
HIDTA	High Intensity Drug Trafficking Area
HUD	Department of Housing and Urban Development
INS	Immigration and Naturalization Service
MCOPS	Mobile Community Outreach Police Stations
NEMLEC	Northeastern Law Enforcement Council
NPT	Nuclear Non-Proliferation Treaty
OAG	Office of Attorney General
OIG	Office of the Inspector General
OJP	Office of Justice Programs
TEAM	Together Everyone Achieves More
UNAD	United Neighbors Against Drugs
USAO	U.S. Attorney's Office
USN	U.S. Department of the Navy

Locations and Numbers of Weed and Seed Sites Funded in Fiscal Year 1998



U.S. General Accounting Office Survey of Weed and Seed Sites

GAO Survey of Weed & Seed Sites

1

GAO U. S. General Accounting Office Survey of Weed and Seed Sites

Introduction

The U.S. General Accounting Office (GAO), an independent agency of Congress, has been asked to review the Weed and Seed Crime Prevention and Human Services Program. As part of this review, we are surveying Weed and Seed grant recipients. We are interested in your site's efforts to leverage funds from other government agencies, non-profit organizations and private sector sources and to measure the success of your Weed and Seed program.

Please answer the questions for the Weed and Seed site indicated on the label below. A few of the questions in the survey require short narrative answers. Additional comments may be written at the end of the survey. If you need to check with someone else to fully answer the questions please do not hesitate to do so.

If you have any questions about this survey, please call Ms. Dennise Stickley at (202) 512 - 8758. Please return the completed survey **no later than Jan. 29, 1999** by fax to (202) 512 - 8692, or in the enclosed preaddressed, prepaid envelope. In the event the envelope is misplaced, our return address is:

U.S. General Accounting Office
Ms. Dennise Stickley
441 G Street, N.W.
Room 2712
Washington, D.C. 20548

Thank you for your cooperation and assistance.

Please provide the following information in the event we require clarification of a response:

Name of primary respondent: _____

Organization/Institution: _____

Title: _____

Telephone: (_____) _____ - _____

Appendix II
U.S. General Accounting Office Survey of Weed and Seed Sites

GAO Survey of Weed & Seed Sites

2

1. What specific **actions** has the Weed and Seed site taken to implement your site's strategy for leveraging funds and/or in-kind assistance from other sources?

2. Have any partnerships or cooperative arrangements with other entities resulted from your site's efforts?

1. Yes. *(Please describe below.)* **97 %**
2. No. → *(Proceed with question 3.)* **3 %**

If yes, please identify the entities and describe the nature of the partnerships or cooperative arrangements:

1. Federal government **67 %** (Please specify: _____)
2. State government **49 %**
3. Local government **82 %**
4. Non-profit sector **75 %**
5. Private sector **61 %**

Please describe the nature of the arrangements:

Appendix II
U.S. General Accounting Office Survey of Weed and Seed Sites

GAO Survey of Weed & Seed Sites

3

3. If the amount of federal Weed and Seed funding the site receives annually has been reduced over the years, what has been your response to these funding reductions? *(Check all that apply.)*

- | | |
|---|-------------|
| 1. <input type="checkbox"/> Not applicable, the amount of Federal Weed and Seed program funding received by the site has not been reduced. → Proceed with question 4. | 55 % |
| ----- | |
| 2. <input type="checkbox"/> Sought additional funding from existing funding sources. | 42 % |
| 3. <input type="checkbox"/> Sought, but did not obtain additional funding from existing funding sources. | 21 % |
| 4. <input type="checkbox"/> Sought and obtained funding from other source(s). | 61 % |
| 5. <input type="checkbox"/> Sought, but did not obtain funding from other source(s). | 30 % |
| 6. <input type="checkbox"/> Reduced Weed and Seed program activities. | 54 % |
| 7. <input type="checkbox"/> No effect. | -- |
| 8. <input type="checkbox"/> Other. | 24 % |

Please explain your response:

4. What would be the site's likely response to any **future reductions** in the annual amount of Federal Weed and Seed program funding? *(Check all that apply.)*

- | | |
|--|-------------|
| 1. <input type="checkbox"/> Seek additional funding from existing funding sources. | 69 % |
| 2. <input type="checkbox"/> Seek funding from other source(s). | 76 % |
| 3. <input type="checkbox"/> Reduce Weed and Seed program activities. | 43 % |
| 4. <input type="checkbox"/> No effect. | 1 % |
| 5. <input type="checkbox"/> Other. | 19 % |

Please explain your response:

Appendix II
U.S. General Accounting Office Survey of Weed and Seed Sites

GAO Survey of Weed & Seed Sites

4

5. What steps has the site taken to sustain your Weed and Seed program in the event federal funding is discontinued? (Check one.)

- 1. Sought additional funding from existing funding sources. 30 %
- 2. Sought funding from other source(s). 40 %
- 3. Reduced Weed and Seed program activities. 11 %
- 4. No contingency plans are in place. 11 %
- 5. Other. 28 %

Please explain your response:

6. For each of the following services provided by the Executive Office of Weed and Seed (EOWS), please indicate: your awareness of the service (Part A); if your site is aware of the service, whether your site has ever used it (Part B); and, if your site has used the service, your level of satisfaction with it (Part C).

<i>EOWS Services</i>	Part A		Part B		Part C		
	Awareness		Use of Service		Level of Satisfaction with Service		
	No	Yes →	No	Yes →	Very Satisfied	Somewhat Satisfied	Not Satisfied
1. Web Site	3%	95%	21%	72%	40 %	44 %	4 %
2. Technical Assistance	--	95%	30%	61%	62 %	19 %	--
3. Training Workshops & Conferences	1%	96%	3%	93 %	75 %	17 %	1 %
4. Weed and Seed <i>Insites</i> Periodic Bulletin	3%	93%	6%	89 %	65 %	22 %	4 %
5. Grant Writing Assistance	27%	70%	18%	74%	64 %	20 %	2 %
6. Advice & Guidance on Site Operations	3%	95%	8%	86 %	73 %	15 %	3.0 %

Appendix II
U.S. General Accounting Office Survey of Weed and Seed Sites

GAO Survey of Weed & Seed Sites

5

7. What specific measures are used to **measure the success** of your Weed and Seed site in achieving the goals and objectives outlined in the Weed and Seed implementation manual?

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____

8. Please identify any published or unpublished research evaluations or assessments involving the Weed and Seed site that have been completed, are ongoing, or planned? *(Please specify title/date/author or contact person's telephone number.)*

Appendix II
U.S. General Accounting Office Survey of Weed and Seed Sites

GAO Survey of Weed & Seed Sites

6

9. Please use the space below to provide any additional comments you have about the Weed and Seed program. If necessary, you may attach additional sheets.

Thank you for your assistance.

Please return this questionnaire by fax to (202) 512-8692 or by mail in the envelope provided.

GAO Site Visit Summaries

Atlanta, GA

BACKGROUND

Atlanta, GA, has been a Weed and Seed site since 1992. Atlanta's target area includes two public housing developments, Thomasville Heights and Capitol Homes; their immediate surrounding areas; and a third community, Mechanicsville. In fiscal year 1998, the total population of the two public housing communities was 2,150, mainly African-American females with a median age of 23 to 28 years. Ten percent of the total population was on felony probation, and an additional 150 adults were under parole supervision. Mechanicsville was characterized as single-family homes surrounding a public housing community.

Atlanta's Weed and Seed goals include to (1) reduce drug sales, drug trafficking activities, and drug-related violent crimes; (2) develop conflict resolution and prevention resources to reduce the incidence of violence in target communities; (3) provide creative options for young people to allow them alternatives to drinking and using drugs; (4) increase public safety awareness through antivictimization techniques; and (5) strengthen relationships with the communities to increase the number of reported crimes and assist in developing intelligence information for undercover use. This project site is initiating a multiagency program to coordinate the delivery of criminal justice and social services to eliminate violent crime, drug trafficking, and drug-related crime and to provide a safe environment for law-abiding citizens to live, work, and raise a family.

Since fiscal year 1992, the Atlanta Weed and Seed program has been awarded about \$3.7 million comprised of grant and asset forfeiture funds. As of December 31, 1998, the Atlanta Weed and Seed program had used about \$3 million. Grant awards ranged from a high of about \$754,000 in fiscal year 1993 to a low of \$175,000 in fiscal year 1998. Asset forfeiture funds were awarded in 5 years and ranged from a high of about \$268,000 in fiscal year 1994 to a low of about \$51,000 in fiscal year 1997. See table III.1 for the funding history of the Atlanta Weed and Seed site.

Appendix III
GAO Site Visit Summaries

Table III.1: Atlanta Weed and Seed Site's Funding History—FY 1992-99 (1998 Constant Dollars)

Fiscal year	Award amount		Amount remaining	
	Grant funds	Asset forfeiture funds	Grant funds	Asset forfeiture funds
1992	\$691,094	\$0	\$0	\$0
1993	754,116	0	0	0
1994	590,129	268,240	0	0
1995	524,109	262,055	142,573	191
1996	205,761	102,881	205,761	24,615
1997	0	50,505	0	50,505
1998	175,000	75,000	175,000	75,000
1999	^a	^a	^a	^a
Total	\$2,940,209	\$758,681	\$523,334	\$150,311

^aAward is pending.

Source: EOWS unaudited data as of December 31, 1998.

ACTIVITIES

Atlanta's weed effort includes the following five-phase approach to reaching program goals: (1) community policing as an overall philosophy and as an institution; (2) intelligence collection and database preparation; (3) investigation; (4) arrests, seizures, and custody; and (5) incarceration and prosecution. The seed effort seeks to develop multiagency community participation in substance abuse prevention and intervention activities. See table III.2 for examples of the types of activities funded by the Atlanta Weed and Seed program, listed by program element.

Appendix III
GAO Site Visit Summaries

Table III.2: Examples of Atlanta Weed and Seed Site's Funded Activities

Program element	Activity	Partner	Description
Law enforcement	Identification and arrest of drug dealers and violent criminals, weapons case referrals	Atlanta's Weed Task Force, Drug Enforcement Administration (DEA), and U.S. Attorney's Office	This joint operation targets street level dealers, gang members, and sources of supply to disrupt and dismantle drug and violent crime gangs preying on target communities by using intelligence and criminal information from sources within and outside the community. In addition, the Weed task force is to refer cases involving weapons to the U.S. Attorney's office for consideration of federal prosecution.
Community policing	Drug Education For Youth (DEFY) Mentoring Program	U.S. Attorney's Office, U.S. Department of the Navy (USN)	DEFY is a mentoring program adopted by the Department of Justice (DOJ) for Weed and Seed in 1996. DEFY is to be a comprehensive program that emphasizes the positive development of the mind, body, and spirit.
	Spring Break— Together Everyone Achieves More (TEAM)	Fulton County Sheriff's Department, Atlanta Police Department, Marta Police, Federal Bureau of Investigation (FBI), U.S. Department of Housing and Urban Development/Office of Inspector General (HUD/OIG)	The Weed Task force sponsored the first annual Spring Break TEAM building camp. Students from the target site spent 2 intensive days with sports figures, HUD/OIG agents, law enforcement officers, and conflict resolution advocates.
Prevention, intervention, and treatment	Prevention through arts	Ballethnic Dance Company	The Ballethnic dance outreach program offers prevention through the arts to students in the elementary and middle schools.
	Family/Community prevention workshops	Viewpoint, Inc.	Viewpoint, Inc., provides family/community prevention workshops to the target areas. A residential treatment component is offered to 20 residents with 3 months of aftercare as an integral part of the recovery process.
Community revitalization	Teens, Crime, and Community Curriculum	Americorp, Victim Witness Assistance Program	The three communities completed a 12-week curriculum of Teens, Crime, and Community that was conducted by Americorp students under the guidance of the Victim Witness Assistance Program. Youths then select community projects. For example, Mechanicsville youths identified the UJAMAA Cookie Corporation as their project and have purchased equipment necessary for their business operation.

Source: GAO survey and EOWS data.

LEVERAGING EFFORTS

Atlanta’s Weed and Seed program officials stated that an important goal for their program is to leverage additional resources from non-Executive Office for Weed and Seed (EOWS) sources to become self-sustaining. During the course of our site visit, we identified several partnerships established by the Atlanta Weed and Seed program to leverage additional resources. These cooperative arrangements involved partners such as the United States Navy and the Georgia Bureau of Investigation. Table III.3 illustrates examples of leveraging efforts that were identified through our survey and site visit.

Table III.3: Examples of Atlanta Weed and Seed Site’s Leveraging Efforts

Type of partnership/cooperative arrangement ^a	Name of partner/cooperative arrangement	Description
Federal government	USN	USN is to host the DEFY Summer Camp—a youth outreach program intended to promote positive life choices in 9-12 year olds through use of role models and education.
	HUD/OIG	HUD/OIG agents work with the Weed task force to investigate crimes occurring in and around public housing developments and assist in the prosecution of individuals involved in criminal activity. Agents assist with the execution of warrants involving residents of public housing.
State government	Georgia Bureau of Investigation (GBI)	GBI provides Drug Awareness and Resistance Education (DARE) instructor training to Atlanta police officers and other law enforcement officers who are dedicated to the Atlanta Weed and Seed Project. In addition, it provides manpower support to the Atlanta Weed Task Force and share intelligence relating to criminal activities in or affecting the Weed and Seed neighborhoods.
Local government	Fulton County Sheriff’s Department	Deputy sheriffs provide junior deputy training in Weed and Seed neighborhoods as well as at the Safe Haven Summer Program. In addition, Fulton County deputies conduct TEAM building camp during public school spring break.
Local community	Viewpoint, Inc.	Viewpoint conducts community/family education and prevention workshops for the three Weed and Seed communities. In addition, Viewpoint is to provide a maximum of 20 slots for Weed and Seed residents identified as needing residential treatment at their residential care facilities.
Local community, University	Pyramid Communications Systems, Inc.	Pyramid Communication Systems (in partnership with Atlanta University’s Economic Development Center) assists in the development and implementation of business plans for the cookie collaborative in Mechanicsville, the concession store for Capitol Homes, and the employment placement firm in Thomasville Heights.

^aNot all partnerships are shown because program officials told us that a complete list was not available.

Source: GAO survey and EOWS data.

SITE'S PERFORMANCE MEASURES

To date, Atlanta has not developed site-specific indicators to measure the results of its program. However, officials said that under the leadership of the Mayor's office, they have developed a detailed weeding strategy that sets forth overall goals and roles of the community, law enforcement, and prosecution and have detailed innovative ideas for consideration. Specific measures of success to be linked to these goals are under consideration. According to the U.S. Attorney for the Northern District of Georgia, a seeding strategy has not yet been developed.

Dyersburg, TN

BACKGROUND

Dyersburg, TN, a small rural community in northwest Tennessee with a population of about 23,000, was officially recognized as a Weed and Seed site in February 1996 and received its first year grant award in September 1996 (see table III.4). When the program began, two target neighborhoods were involved; now the site has expanded into four target neighborhoods. The steering committee used the following criteria to select target neighborhoods: (1) an increase in drug trafficking and potential for street gang activity, (2) an increase in crime statistics indicating violence, (3) juvenile crime rates, (4) a lack of adequate employment opportunities, (5) truancy and school drop-out rates, and (6) the potential for residents' involvement in and commitment to the program.

Since fiscal year 1996, the Dyersburg Weed and Seed program was awarded about \$734,000, comprising grant and asset forfeiture fund awards. As of December 31, 1998, the Dyersburg Weed and Seed program had used about \$563,000. Grant awards ranged from a high of \$275,000 in fiscal year 1998 to a low of about \$129,000 in fiscal year 1996. The Dyersburg Weed and Seed program received one asset forfeiture fund award in fiscal year 1996 of about \$103,000. See table III.4 for the funding history of the Dyersburg Weed and Seed site.

Table III.4: Dyersburg Weed and Seed Site's Funding History—FY 1996-99 (1998 Constant Dollars)

Fiscal year	Award amount		Amount remaining	
	Grant funds	Asset forfeiture funds	Grant funds	Asset forfeiture funds
1996	\$128,601	\$102,881	\$0	\$0
1997	227,273	0	0	0
1998	275,000	0	170,600	0
1999	^a	^a	^a	^a
Total	\$630,874	\$102,881	\$170,600	\$0

^aAward is pending.

Source: EOWS unaudited data as of December 31, 1998.

ACTIVITIES

Dyersburg provides a variety of Weed and Seed activities for children, youth, and adults at its safe haven, which is coordinated through the Dyersburg City Community Resource Center. Table III.5 shows examples of the types of activities funded by the Dyersburg Weed and Seed program, listed by program element.

Appendix III
GAO Site Visit Summaries

Table III.5: Examples of Dyersburg Weed and Seed Site's Funded Activities

Program element	Activity	Partner	Description
Law enforcement	Computer-aided dispatch system	Dyersburg Police Department	System to link the communications systems of Dyer County law enforcement, fire, and ambulance systems.
	Juvenile Court Referee	Dyer County Courts	Expedite juvenile offenders court adjudication. Site reported that by quicker adjudication it noted a substantial decrease in the number of juvenile cases.
Community policing	Supplies for citizen police academy classes	Dyersburg Police Department	Academy to familiarize its citizens with the police department, its personnel, its goals, and the way it operates.
Prevention, intervention, and treatment	Summer program for boys and girls	YMCA	Day camp for children, including breakfast and lunch, organized games, arts, songs, and character development.
	Umoja After-School Enrichment Program	Ross United Methodist Church	This safe haven developed a complementary after-school program designed to assist parents, churches, and public schools in enhancing the quality of life for children.
Community revitalization	Downtown Dyersburg Revitalization Summit	The Council for Urban Economic Development	Community summit to design and implement an economic development strategy and prepare for new economic opportunities.

Source: GAO survey and EOWS data.

LEVERAGING EFFORTS

Dyersburg Weed and Seed program officials told us an important goal for their program is to leverage additional resources from non-EOWS sources to become self-sustaining. During the course of our site visit, we identified several partnerships established by the Dyersburg Weed and Seed program to leverage additional resources. These cooperative arrangements involved partners such as the Bureau of Alcohol, Tobacco and Firearms (ATF) and local Dyersburg businesses. Table III.6 illustrates examples of leveraging efforts that were identified through our survey and site visit.

Appendix III
GAO Site Visit Summaries

Table III.6: Examples of Dyersburg Weed and Seed Site’s Leveraging Efforts

Type of partnership/cooperative arrangement^a	Name of partner/cooperative arrangement	Description
Federal government	DEA and ATF	Site reported that participation with these agencies has enabled more law enforcement coverage with its small police force and resulted in prosecutions and convictions of over 25 major drug dealers in northwest Tennessee.
State government	Tennessee Bureau of Investigations	Also was a partner in above investigations.
Local government	Dyersburg School System	Provides a staff member at no cost to help run safe haven program.
	Dyersburg Police Department	Provides a staff member at no cost to administer the Weed and Seed program.
	Dyersburg Police Department	Doubled size of bike patrol—now has a two-person bike patrol team in all four Weed and Seed target areas.
	Target area resident	Residents rented a house to the City of Dyersburg for 10 years at 1 dollar per year plus property tax. House is to be used as a mini-police precinct in target area.
Private sector	Local businesses	Provide in-kind donations of food and other supplies to various Weed and Seed functions, such as picnics and barbecues.

^aNot all partnerships are shown because program officials told us a complete list was not available.

Source: GAO survey and EOWS data.

SITE’S PERFORMANCE MEASURES

Dyersburg does not use site-specific indicators to measure the results of its program. However, in response to our survey, the site coordinator reported that the site used a variety of methods to measure program success, and that evaluation was a regular and ongoing part of the program. First, the local steering committee met monthly to review and the program. Second, the police chief reviewed the program and offered regular input. Third, the site coordinator and safe haven coordinator regularly reviewed activities funded or assisted by the Weed and Seed program to ensure that they were meeting program requirements. While these methods might prove useful to local officials, they do not measure outcomes or results.

Philadelphia, PA

BACKGROUND

Philadelphia, PA, was officially recognized as one of the original Weed and Seed sites in 1992. The Philadelphia target area is bounded on the east by Front Street, on the west by Fifth Street, on the north by Westmoreland Street, and on the south by Berks Street. In addition, the target area encompasses the Philadelphia 25th and 26th police districts. The target area has a higher proportion of the population under 18 than any other area of Philadelphia. The most prevalent illegal drugs of choice have been cocaine and heroin, and the continued focus of the Weed and Seed initiative is toward both major traffickers of illegal drugs as well as those engaged in street sales.

The continuing goal of this site is to revitalize the neighborhood and provide the opportunity for the residents in the community to live, work, and raise children in a safe and clean environment. Objectives for this site are to (1) control violent and drug-related crime; (2) enhance public safety and security by mobilizing neighborhood residents; (3) create a healthy and supportive environment by preventing and combating crime, drug use, unemployment, illiteracy, and disease; and (4) revitalize the neighborhood.

Since fiscal year 1992, the Philadelphia Weed and Seed program has been awarded about \$4 million for the program comprising grant and asset forfeiture fund awards. As of December 31, 1998, the Philadelphia Weed and Seed program had used about \$3.6 million. Grant awards ranged from a high of about \$1.2 million in fiscal year 1992 to a low of about \$177,000 in fiscal year 1997. Asset forfeiture funds were awarded in 5 years and ranged from a high of about \$288,000 in fiscal year 1994 to a low of about \$103,000 in fiscal year 1996. See table III.7 for the funding history of the Philadelphia Weed and Seed site.

Appendix III
GAO Site Visit Summaries

Table III.7: Philadelphia Weed and Seed Site's Funding History—FY 1992-99 (1998 Constant Dollars)

Fiscal year	Award amount		Amount remaining	
	Grant funds	Asset forfeiture funds	Grant funds	Asset forfeiture funds
	1992	\$1,240,135	\$0	\$0
1993	0	0	0	0
1994	536,480	288,240	0	0
1995	524,109	262,055	0	0
1996	205,761	102,881	0	86
1997	176,768	176,768		40,813
1998	308,588	170,000	133,588	170,000
1999	^a	^a	^a	^a
Total	\$2,991,841	\$999,944	\$133,588	\$344,486

^aAward is pending.

Source: EOWS unaudited data as of December 31, 1998.

ACTIVITIES

Philadelphia's Weed and Seed site activities are focused on strategies to assist children and youths in becoming productive and law-abiding citizens; free them from drug and alcohol abuse; establish safe haven multiservice education centers (four are currently operating)¹ in drug- and crime-free environments; continue Community Resource Centers that provide an array of social services; and conduct or provide antidrug marches/vigils, neighborhood clean-ups, employment training, community organizing, youth programs, volunteer recruitment, and information and referral. Table III.8 shows examples of activities funded by the Philadelphia Weed and Seed site, listed by program element.

¹The four Philadelphia, PA, safe havens are the Community of United Neighbors Against Drugs (CUNAD), Fairhill Community Center, Norris Square Neighborhood Project, and United Neighbors Against Drugs (UNAD). Typical activities in these safe havens include tutoring; summer day camps; health fairs; nutrition education; prevention through providing substance abuse and child abuse information; and recreational activities, such as baseball, basketball, and summer olympic games.

Appendix III
GAO Site Visit Summaries

Table III.8: Examples of Philadelphia Weed and Seed Site’s Funded Activities

Program element	Activity	Partner(s)	Description
Law enforcement	Ongoing investigations and prosecutions	DEA, FBI, ATF, U.S. Attorney’s Office (USAO), Office of Attorney General (OAG), Immigration and Naturalization Service (INS), and the Philadelphia Police Department	These organizations are to conduct collaborative investigations among law enforcement agencies. In addition, community residents provide information to the police mobile units as well as provide anonymous information to officers.
Community policing	CUNAD antidrug march and rally	Safe Havens, Philadelphia Police Department, Schools, Neighborhood Organizations, Health Maintenance Organizations, and citizen volunteers	These organizations participate in and support antidrug marches.
Prevention, intervention, and treatment	Referral services, preparing to begin prevention and treatment workshops in other Weed and Seed areas	Community groups, Alcoholics Anonymous, Narcotics Anonymous, Target City Service, and Central Intake Unit	These groups provide training and workshops relating to drug and alcohol treatment and prevention. Residents become involved by taking part in the workshops and training provided and accepting referrals for drug rehabilitation programs.
	Conflict resolution in schools	Schools, Shalom, Safe Havens, AmeriCorps, DARE programs, etc.	Prevention specialists teach conflict resolution in schools. Residents become involved by participating in the programs offered in the schools for their youths and volunteering in the community and safe havens.
Community revitalization	Creating a clean and attractive environment	Community groups, parents, youths, Phila More Beautiful, Pennsylvania Army National Guard, AmeriCorps, and city services	The goal of this activity is to motivate parents, youths, schools, and businesses to work together toward a clean and viable community. Youth volunteer to participate to take part in area clean ups and attend community service projects to earn community service hours, and residents clean area in front of homes.

Source: GAO survey and EOWS data.

LEVERAGING EFFORTS

Philadelphia’s Weed and Seed Program officials told us an important goal for their program is to leverage additional resources from non-EOWS sources to become self-sustaining. During the course of our site visit, we identified several partnerships established by the Philadelphia Weed and Seed program to leverage additional resources. These cooperative arrangements involved partners, such as the Pennsylvania Army National Guard and Villanova University. Table III.9 illustrates examples of leveraging efforts that were identified through our survey and site visit.

Table III.9: Examples of Philadelphia Weed and Seed Site’s Leveraging Efforts

Type of partnership/cooperative arrangement ^a	Name of partner/cooperative arrangement	Description
Federal government	DOJ’s High Intensity Drug Trafficking Area (HIDTA) Program	DOJ’s HIDTA assesses the extent of and change in the demographics of drug-using offenders and is to create an integrated and collaborative intelligence center to focus on narcotics trade in the area.
State government	Pennsylvania Army National Guard	This partner provides conflict resolution training, camping trips, and demand reduction programs and assists in coordinating the DEFY program.
Public, private, and nonprofit agencies	Phil-Abundance, Greater Philadelphia Food Bank, and Coca-Cola	These organizations provide food, drinks, and snacks to safe havens and after-school programs at no cost.
University	Swarthmore College, Villanova University, Edinboro University, and Eastern College	Universities provide volunteers to assist with safe haven activities and other projects, such as smoke detector installations and clean ups.
City government	Philadelphia Police Department	The department provides police officers to patrol the Weed and Seed area on bikes, conduct special investigations, train block captains, etc.

^aNot all partnerships are shown because program officials told us a complete list was not available.
Source: GAO survey and EOWS data.

SITE’S PERFORMANCE MEASURES

In response to our survey, the site coordinator reported that this site uses a variety of methods to measure success in achieving its Weed and Seed program goals and objectives. Methods cited include (1) conducting pretests and posttests for various programs implemented, (2) using sign-in sheets for various activities to monitor trends in community involvement, (3) conducting youth and parent surveys, and (4) using various police statistics to measure the success of operations.

In addition, Temple University completed an evaluation of the Philadelphia Weed and Seed project in the fall of 1997, reporting the program’s impact in the community between 1992 and 1997. Since the completion of this evaluation, it has been shared with the Attorney General of the United States and discussed with city officials as well as discussed at Weed and Seed Steering Committee meetings. According to Philadelphia Weed and Seed site officials, they have begun to take action as a result of this evaluation. For example, the Weed and Seed site hosted an 1-day “Getting Back to the Strategy” session in March 1998. The purpose of this session was to bring representatives from all Weed and Seed components together as a group to make the Weed and Seed target area a clean and safe place to live and raise children.

San Diego, CA

BACKGROUND

San Diego, CA, was officially recognized as a Weed and Seed site in 1992. The Weed and Seed target area in San Diego includes three of the six neighborhoods that comprise the central sector of the southeast San Diego area. San Diego's target area has a total population of 22,137 (8,494 youths 17 years or younger; 13,643 adults 18 years and older). The total number of households is about 5,000, and the ethnic composition is approximately 54 percent African American, 33 percent Latino, and 13 percent other. The median family income is \$18,062, and about 39 percent of the total population is below poverty level.

During our visit to the San Diego Weed and Seed site, we and the EOWS program monitor who accompanied us identified a number of problems affecting the site's successful implementation of the Weed and Seed program. One of the problems we identified was the lack of direct U.S. Attorney and resident involvement in the steering committee. EOWS requires that the U.S. Attorney be involved with the steering committee and that residents be actively involved. On the basis of our observations during our site visit and the report from the EOWS program monitor, it appeared that the residents in the target area and the city agencies in the community did not always agree on how the Weed and Seed program should be implemented in San Diego. The site coordinator told us there was a lack of communication among the U.S. Attorney's office, the Mayor's office, and community residents on how Weed and Seed funds should be allocated and what activities and services should be provided to the target area.

During the course of our review, EOWS decided not to qualify San Diego for fiscal year 1999 funding on the basis of the above observations and their own analysis of the San Diego Weed and Seed site. As a result, the San Diego City officials and the U.S. Attorney's office have renewed their commitment to the San Diego Weed and Seed site. They agreed to work together to restructure the existing Executive Steering Committee and provide the site with improved direction to ensure its future success in implementing the Weed and Seed program in San Diego.

Since fiscal year 1992, the San Diego Weed and Seed program has been awarded about \$3.5 million for the program comprised of grant and asset forfeiture funds. As of December 31, 1998, the San Diego Weed and Seed program had used about \$2.9 million. Grant awards ranged from a high of about \$691,000 in fiscal year 1992 to a low of about \$51,000 in fiscal year 1997. Asset forfeiture funds were awarded in 3 years and ranged from a

Appendix III
GAO Site Visit Summaries

high of about \$268,000 in fiscal year 1994 to a low of about \$103,000 fiscal year 1996. See table III.10 for the funding history of the San Diego Weed and Seed site.

Table III.10: San Diego Weed and Seed Site's Funding History—FY 1992-98 (1998 Constant Dollars)

Fiscal year	Award amount		Amount remaining	
	Grant funds	Asset forfeiture funds	Grant funds	Asset forfeiture funds
1992	\$691,094	\$0	\$0	\$0
1993	534,577	0	0	0
1994	590,129	268,240	0	0
1995	524,109	262,055	63,958	17,820
1996	205,761	102,881	101,728	102,881
1997	50,505	0	50,505	0
1998	225,000	0	225,000	0
Total	\$2,821,175	\$633,176	\$441,191	\$120,701

Note: The San Diego Weed and Seed site was not offered funding for fiscal year 1999.

Source: EOWS unaudited data as of December 31, 1998.

ACTIVITIES

San Diego provides a variety of Weed and Seed activities, such as Neighborhood Policing Teams, which conduct bike and foot patrols of the community, and a safe haven, which teaches children about computers. Table III.11 shows other examples of the types of activities funded by the San Diego Weed and Seed program, listed by program element.

Appendix III
GAO Site Visit Summaries

Table III.11: Examples of San Diego Weed and Seed Site’s Funded Activities

Program element	Activity	Partner(s)	Description
Law enforcement	Violent Crimes Task Force and other local law enforcement task forces	San Diego Police Department, INS, ATF, FBI, DEA, California Department of Corrections, San Diego District Attorney, San Diego County Probation, and San Diego City Attorney	The San Diego Police Department coordinates and works with the task forces to arrest and adjudicate violent criminal offenders for activities such as gang involvement, drug trafficking, and car theft in the Weed and Seed target area.
Community policing	Neighborhood Policing Teams (NPT)	San Diego Police Department	The NPT works with local residents to address community concerns, including drug and gang activity, public intoxication, code compliance, properties in need of boarding, securing, and other nuisance and crime-related activities. The NPT uses foot and bike patrols and substations as a means of monitoring the target area.
Prevention, intervention, and treatment	Safe Haven Computer Assembly Course	Children’s/Youth Choir, Inc.	A course for children in grades 6-12 designed to teach them about the different parts and functions of computers. Children learn how to assemble and operate a computer, including installing and using software.
	Safe Haven Arts and Culture Course	Arts and culture instructor	A course for children ages 9-13 designed to provide them with art instruction, such as basic drawing techniques, and develop art work to be displayed at a “Community Pride Day” in the Weed and Seed target area.
Community revitalization	Community pride events	Various	A community pride event intended to bring target area residents together in a celebration of diversity, unity, and community pride. An example of an event is to hold a festival at one of the target area parks providing entertainment, food, fun and games, music, and other types of entertainment.

Source: GAO survey and EOWS data.

LEVERAGING EFFORTS

An important stated goal for San Diego’s Weed and Seed program is to leverage additional resources from non-EOWS sources to become self-sustaining. During the course of our site visit, we identified several partnerships established by the San Diego Weed and Seed program to leverage additional resources. These cooperative arrangements involved partners such as the San Diego Police Department and the San Diego public schools. Table III.12 illustrates examples of leveraging efforts that were identified through our survey and site visit.

Table III.12: Examples of San Diego Weed and Seed Site’s Leveraging Efforts

Type of partnership/cooperative arrangement ^a	Name of partner/cooperative arrangement	Description
Federal, state, and county governments	A variety of federal, state, and county law enforcement agencies	The San Diego Police Department coordinates as well as participates in task force operations not funded by the Weed and Seed Program.
Federal, state, county, and city governments, and private and nonprofit agencies	A variety of federal, state, county, city government, and community and quasi-governmental agencies	A variety of programs (computer assembly course, arts and culture class, etc.) and services (youth mentoring, job assistance) are offered through partnerships with a number of agencies at cost or below market cost to the Weed and Seed program.
Local government	San Diego Police Department and City of San Diego	The police department deploys paid staff, volunteers, and patrol officers to the target area. The city provides a satellite office, for use by the police department, dedicated to the Weed and Seed target area.
	City of San Diego	The San Diego City Parks and Recreation service offers a rent-free facility to the Weed and Seed program for use as a safe haven. In addition, the city offers other administrative services with minimal overhead costs.
City and nonprofit sector	San Diego public schools, City of San Diego, and a number of community agencies	Facilities are provided rent-free for a number of Weed and Seed activities.

^aNot all partnerships are shown because program officials told us a complete list was not available.
Source: GAO survey and EOWS data.

SITE’S PERFORMANCE MEASURES

In response to our survey, the Weed and Seed site coordinator reported that Weed and Seed efforts in the San Diego target area were evaluated through a number of different methods. Evaluations of weeding efforts included (1) performing a comparative analysis of crime statistics compiled for the target area; (2) tracking police actions established by residents, community organizations, and businesses; and (3) maintaining statistics on community contacts made and events attended by police officers.

For the seeding efforts, these methods included (1) requiring monthly activity reports and conducting periodic site visits of all Weed and Seed programs in the target area; (2) checking programs’ compliance with the contracted scope(s) of services, which are to be based on Weed and Seed programs’ goals and objectives; (3) tracking the number of participants in the programs; (4) evaluating the quality and/or duration of services provided to participants; and (5) evaluating program participant service outcomes and their evaluations of the programs.

While these measures might be useful in better understanding the activities funded by the San Diego Weed and Seed program, they primarily measure the level of activities, not program results. Further, while the analysis of crime statistics appears to be more outcome oriented, it is difficult to determine a direct link between a reduction in crime rates and Weed and Seed activities.

Woburn, MA

BACKGROUND

Woburn, MA, has been officially recognized as a Weed and Seed site since 1996. The target area is made up of the downtown area of Woburn and was selected due to the high crime rate and drug sales and the high rate of public housing developments and publicly assisted housing.

During the course of our review, EOWS decided not to qualify Woburn for fiscal year 1999 funding. According to EOWS, Woburn had not submitted the required quarterly financial reports and semiannual progress reports that are required by its grant award. However, Woburn would be eligible to be qualified for grant funds in fiscal year 2000 as long as the requirements of its previous awards are met.

The Woburn Weed and Seed program was awarded about \$305,000 in grant fund awards for the program for fiscal years 1996 and 1997. The awards were about \$177,000 in fiscal year 1997 and about \$129,000 in fiscal year 1996. As of December 31, 1998, the Woburn Weed and Seed program had used about \$213,000. The Woburn Weed and Seed site was awarded \$50,000 in asset forfeiture funds in fiscal year 1996. However, in fiscal year 1999, EOWS deobligated these funds since the Woburn Weed and Seed site was unable to use these funds for a law enforcement operation. See table III.13 for funding history of the Woburn Weed and Seed site.

Table III.13: Woburn Weed and Seed Site's Funding History—FY 1996-98 (1998 Constant Dollars)

Fiscal year	Award amount		Amount remaining	
	Grant funds	Asset forfeiture funds	Grant funds	Asset forfeiture funds
1996	\$128,601	^a	\$0	^a
1997	176,768	\$0	92,457	\$0
1998	^b	0	^b	0
Total	\$305,369	\$0	\$92,457	\$0

Note: The Woburn Weed and Seed site was not offered funding for fiscal year 1999.

^aThe Woburn Weed and Seed site was awarded \$50,000 in asset forfeiture funds. However, in fiscal year 1999, EOWS deobligated these funds since the Woburn Weed and Seed site was unable to use these funds for a law enforcement operation.

^bThe Woburn Weed and Seed site was offered funding for fiscal year 1998, but the site did not meet grant application requirements

Source: EOWS unaudited data as of December 31, 1998.

ACTIVITIES

Woburn provides a variety of Weed and Seed activities, such as a safe haven, which includes helping children with homework assignments, and a Job Links career enhancement program, which provides job readiness training for adults. Table III.14 shows other examples of the types of activities funded by the Woburn Weed and Seed program, listed by program element.

Table III.14: Examples of Woburn Weed and Seed Site's Funded Activities

Program element	Activity	Partner	Description
Law enforcement	Drug investigations	Woburn Police Department, Northeastern Massachusetts Law Enforcement Council (NEMLEC) Drug Task Force, and DEA	A coordinated operation conducted by the Woburn Police Department, NEMLEC, and DEA. Funds are to be used for police overtime.
Community policing	Community policing	Woburn Police Department	A partnership between community police officers and residents to reduce crime and fear of crime through enforcement and community problem solving, using problem-oriented policing and empowering residents to create a safe neighborhood for themselves. Funds are to be used for police overtime.
Prevention, intervention, and treatment	Safe Haven/Kids Club	North Suburban YMCA	After-school educational/recreational program run in the housing developments for children ages 5-10. Focus is on developing reading and social interaction skills and alcohol/drug/safety education.
	Safe Haven/After-school program	Shamrock Elementary School	Assists youths with homework assignments, classroom difficulties, and problems associated with language barriers. Other components include drama, art, and language clubs and English as a Second Language program for parents.
	Youth Tracking Program—mentor/coordinator	Woburn Housing Authority, Woburn Police Department	Assists community professionals and community police officers in tracking high-risk youths ages 12-17. Youth tracker also tracks youth crime, truancy, and youths in need of assistance and support.
Community revitalization	Job Links career enhancement program	Community Services Network	Provides résumé writing, career counseling, interview skills, and job readiness training for adults.

Source: GAO survey and EOWS data.

LEVERAGING EFFORTS

An important stated goal for Woburn's Weed and Seed program is to leverage additional resources from non-EOWS sources to become self-sustaining. During the course of our site visit, we identified several partnerships established by the Woburn Weed and Seed program to leverage additional resources. These cooperative arrangements involved

partners such as the Woburn Housing Authority and the Boys and Girls Club. Table III.15 illustrates examples of leveraging efforts identified through our survey and site visit.

Table III.15: Examples of Woburn Weed and Seed Site’s Leveraging Efforts

Type of partnership/cooperative arrangement ^a	Name of partner/cooperative arrangement	Description
State government	Commonwealth of Massachusetts’ Executive Office of Public Safety	Cooperative work arrangement with the state to conduct an evaluation of Woburn’s Weed and Seed site.
State and local governments	City of Woburn	Using state funds, the city hired a substance abuse counselor to act as the liaison for drug prevention efforts between the city and other entities. This position was created as a direct result of Weed and Seed efforts.
Local government	Woburn Housing Authority	Provides assistance in administering the Weed and Seed grant and provides space for a variety of Weed and Seed activities.
	Woburn Police Department	Provides space to house Weed and Seed programs and allows their vehicles to be used for Weed and Seed activities at no charge.
Nonprofit sector	Boys and Girls Club and YMCA	Provide staff and facilities for Weed and Seed-sponsored activities.

^aNot all partnerships are shown because program officials told us a complete list was not available.
Source: GAO survey and EOWS data.

SITE’S PERFORMANCE MEASURES

In response to our survey and our site visit, the Weed and Seed site coordinator reported that the Weed and Seed efforts in the Woburn target area were evaluated through a number of different methods. The indicators used to measure the success of law enforcement efforts included tracking (1) the number and types of crime within the target area, (2) the number of drug arrests, and (3) the number of drug cases that have been started in the target area. For the community-policing element, the indicators used included monitoring the information flow between Community Oriented Police officers and narcotics officers.

For the prevention, intervention, and treatment element, the indicators used included tracking the attendance and observing the activities at the various Weed and Seed programs. As for the neighborhood revitalization element, the indicators used included tracking the number of jobs that were found by participants in the Weed and Seed program and calculating the increased economic activity within the target area as a result of the Weed and Seed effort.

While these measures might be useful in better understanding the activities funded by the Woburn Weed and Seed program, they primarily measure the level of activities, not program results. Further, while the analysis of crime statistics and tracking the number of jobs found by Weed and Seed program participants appear to be more outcome oriented, it is difficult to determine a direct link between these indicators Weed and Seed activities.

Comments From the Department of Justice

Note: GAO comments supplementing those in the report text appear at the end of this appendix.



U.S. Department of Justice

Office of Justice Programs

Office of the Assistant Attorney General

Washington, D.C. 20531

JUL 01 1999

Mr. Richard M. Stana
Associate Director
Administration of Justice Issues
General Accounting Office
Washington, D.C. 20548

Subject: Office of Justice Programs' (OJP) Comments on Draft Report: "More Can Be Done to Improve Weed and Seed Grant Program Management" (GGD-99-110)

Dear Mr. Stana:

Thank you for the opportunity to review and comment on the subject General Accounting Office (GAO) draft report. For ease of review, we have italicized text from the draft report, followed by our comments. We request that you make adjustments to the report based on the comments that follow, prior to submitting the final report to Hon. Judd Gregg, Chairman, Subcommittee on Commerce, Justice, State, the Judiciary, and Related Agencies, Committee on Appropriations, U.S. Senate.

Highlights of this Response

The highlights of our response to the GAO Draft Report are as follows:

- o The GAO made many program visits and conducted site surveys on the effectiveness of the program yet the narrative fails to provide much insight into the findings of the surveys. EOWS recommends that GAO provide additional discussion of its own survey results.
- o While EOWS has in place certain internal controls encompassing funding decisions, we concur with the need to in all instances fully document other decisions that qualify applicants to apply for Weed and Seed funding.

Richard M. Stana, Page No. 2

- o EOWS acknowledges that some programmatic monitoring reports were not completed, but has already taken corrective action and reports for all site visits are up to date.
- o EOWS acknowledges problems with ensuring that sites submit progress reports in a timely manner and, in response, EOWS will develop a policy to suspend access to funding for grantees who fail to meet this requirement.
- o EOWS disagrees with the recommendation to develop criteria (or measures) to ascertain self-sustainment. This is redundant since EOWS already applies a 5-year rule requiring grantees to target additional neighborhoods if funding is to continue. This approach is consistent with that followed by other federal discretionary grant programs.
- o EOWS acknowledges the need to improve performance measures to assess the impact of the Weed and Seed program strategy. However, we disagree with GAO that crime crime statistics and in particular the homicide rates are not valid impact measures. We are making additional efforts to broaden the range of our performance outcome measures for Weed and Seed but as a public safety program crime statistics are highly relevant.
- o EOWS strongly recommends that GAO review and incorporate where appropriate the findings from the recently completed independent impact evaluation of Weed and Seed. EOWS is greatly concerned about the GAO Report's omission of the most relevant Weed and Seed program effectiveness measure available.
- o The title of the Report should be changed to "The Weed and Seed Program - A Review of its Efficiency and Effectiveness" to more accurately reflect the stated purpose of the audit.

Report Title

We believe the report title should be changed to reflect your mandate to review the efficiency and effectiveness of the Weed and Seed Program, as noted on page 2 of your report. Therefore we request you change the title to "The Weed and Seed Program - A Review of the Efficiency and Effectiveness.

See comment 1.

Richard M. Stana, Page No. 3

EOWS' Internal Control Weakness Hampers Weed and Seed Program Management

"EOWS has not established an adequate internal control requiring that significant program management decisions be documented. EOWS management has not always documented EOWS decisions, such as qualifying new and existing sites for funding." (pg. 2)

"EOWS does not have an adequate internal control that requires Weed and Seed new and existing site qualification for funding decisions always be documented." (pg. 10)

"According to EOWS management officials, these approvals were granted on the basis of additional information provided by the local U.S. Attorneys, however this additional information was not documented by EOWS." (pg. 12)

"EOWS lacks an adequate internal control that requires that the basis and rationale for new Weed and Seed qualification for funding decisions always be fully documented." (pg. 26)

While EOWS agrees with the suggestion for strengthening documentation of all aspects of the funding eligibility process, internal controls are currently in place to ensure grants are awarded in accordance with Office of Management and Budget (OMB), and OJP policies (see Enclosure I). Sites are required to submit all applicable forms as prescribed in OMB Circular A-102, Subpart B (pre-award requirements).

In addition, OJP/EOWS requires additional OJP approved documentation.¹ These documents are referenced in the program guide and application kit. The application then enters a process of evaluation and finally approval or disapproval by the Assistant Attorney General (AAG), OJP.

The application is further supported by documentation from EOWS in the form of a Grant Manager's Memorandum (GMM) to the AAG. The GMM outlines the basis and rationale for funding decisions. The GMM is signed and certified by the Program Manager and Director of

¹ Summary of applicant's Weed and Seed Strategy; Certification of on-going activities signed by the U. S. Attorney and applicant; Budget, Budget Narrative, Accounting System and Financial Capability Questionnaire (for new applicants); letter stating Federal funds will supplement, not supplant, applicant funds; Certifications Regarding Lobbying, Debarment, Suspension, and Other Responsibility Matters; Drug-Free Workplace Requirements (OJP form 4061/6); and the GPRA submission, Coordination with other Federal Resources information, National Directory Update, map depicting the street boundaries of the designated area, and Census Tract(s) of the designated area.

See comment 2.

Richard M. Stana, Page No. 4

EOWS, to certify and recommend that an applicant be considered for award. The GMM includes the Project Overview, Coordination of Efforts, Project Implementation Plan, Approved Budget, and Evaluation and Monitoring Plans for effective program management. The signed and certified GMM, required OMB approved forms, OJP approved forms, and the application are then forwarded to the Office of the Comptroller (OC) for Grant Certification.

Next, the application must be reviewed and certified by the Comptroller and the Assistant Attorney General before an award is made. OC reviews the application for all the required documentation and budget compliance with OMB cost circulars. The application is tracked through an automated internal control system to ensure applications have been reviewed and awarded in a competitive manner and the required documentation has been submitted. The application must be signed and certified by the Financial Analyst, Budget Analyst, Supervisory Financial Analyst, Comptroller, and Assistant Attorney General before an award is made.

Finally, if all the required documents and signatures are in place, the application is forwarded to the Office of Congressional and Public Affairs (OCPA) for notification to the respective Congressional delegation and U.S. Attorney(s).

These documents and certifications ensure that all awards made by OJP/EOWS have been reviewed and approved by the appropriate officials. If any of the required forms or signatures are not submitted, an award will not be made. These internal controls ensure funding decisions have been documented and tracked in an automated system, and are supported by paper documentation.

“EOWS did not always fully document how it made its decisions on whether to qualify the 177 existing sites for continued funding, and special project funding. Although EOWS officials could provide us with documentation for some of the information considered for existing sites, such as unspent grant award balances and compliance with reporting requirements, we could not determine the basis and rationale for the decisions to qualify 164 of the 177 existing sites for continued funding.... In addition, EOWS could not provide us with documentation regarding its special project funding qualification decisions.” (pg. 13)

“However, from our review of the available documentation for the remaining 164 sites, we were unable to determine the basis and rationale for these funding qualification decisions.” (pg. 15)

Richard M. Stana, Page No. 5

“EOWS management officials told us their decision to qualify these sites for funding based on their personal knowledge of these sites’ activities. However, we were not able to determine the basis and rationale for these decisions because they were not documented in the information provided to us by EOWS.” (pg. 15)

As stated in the Weed and Seed FY1999 Application Kit, sites were given the opportunity to apply for continuation funding based on a case-by-case consideration of specified factors, including the potential for future community benefits and compliance with OJP requirements.

We believe GAO is incorrect in these assertions, as EOWS has the basis and rationale for the funding decisions. The previously noted process demonstrates the internal controls and checks and balances each application must comply with to receive funds.

OJP/EOWS Request for Changes to the Final Report

We request:

1. The title of this finding in the final report be changed to “EOWS Management Controls Could Be Improved;”

EOWS Did Not Ensure That Weed and Seed Sites Met Grant Requirements

“In addition, EOWS grant monitors did not always document their site visits.” (pg. 17)

“According to EOWS management officials, the grant monitors have not always documented their site visits due to the large number of sites they are responsible for monitoring - as many as 23 sites per monitor.” (pg. 18)

EOWS acknowledges the need to keep current documentation of all monitoring visits. Additional staff have been hired, thus reducing workloads and alleviating monitoring pressures. It should be noted that through feedback from consultants’ site visits, activity data generated from Government Performance and Results Act (GPRA) activity, and observations from U. S. Attorneys, much information about sites is available to assist the monitoring and site evaluation process.

While formal documentation may not have been completed for every site visit conducted by all program monitors, EOWS officials do know when site visits are performed through debriefing by the program monitors. It should be acknowledged, however, with the tremendous growth in the number of sites and dollars granted by EOWS, we recognized the

See comment 1.

Richard M. Stana, Page No. 6

need to increase staff to alleviate monitoring pressures. As a result, EOWS has increased staff by an additional four program managers in April 1999, to decrease the number of sites each program manager must monitor. We believe that the increase in staff will provide better program management and more timely documentation. All site visit reports are now up to date.

EOWS program managers rely on many tools for ensuring monitoring beyond the documented site visits or phone calls. These tools include evaluating site visits and progress reports, continual feedback from U.S. Attorneys' Offices, and training and technical assistance sponsored by EOWS. EOWS believes that Weed and Seed grantees have received a high level of monitoring and oversight, as well as support from EOWS. This process also aids in the site selection and special project funding process.

“EOWS also did not always ensure that local Weed and Seed sites met a grant requirements—the submission of progress reports. Progress reports are an important tool to help EOWS management and grant monitors determine how sites are meeting program objectives and to assist them in making further grant qualification decisions. Almost one-half of the 177 sites funded in fiscal year 1998 had not submitted all of the required progress reports. In addition, while EOWS is to conduct monitoring visits of all Weed and Seed sites in order to determine the sites’ compliance with grant requirements, EOWS grant monitors did not always document these visits.” (pg. 3)

“EOWS did not always ensure that local Weed and Seed sites complied with a critical grant requirement—the submission of progress reports.” (pg. 17)

“In addition, EOWS has not always ensured through its grant monitoring process that site monitoring reports - a grant requirement - were submitted or that grant monitors documented their site visits.” (pg. 26)

The report's criticisms regarding missing programmatic reports are warranted and new approaches will be explored to address a chronic problem of grantees not submitting programmatic progress reports in a timely manner. Failure to submit financial reports in a timely manner currently results in a suspension of grant funding. This is an OJP policy which includes grants awarded by EOWS. There are far fewer instances of sites failing to submit financial reports because of the consequences. EOWS will propose that a grantee's failure to submit progress reports in a timely manner will result in a suspension of funding.

See comment 1.

Richard M. Stana, Page No. 7

OJP/EOWS Request for Changes to the Final Report

We request that the title of this finding in the final report be changed to “EOWS Could Improve Documentation of Program Monitoring.” In addition, we request the final report be revised to reflect all other ongoing monitoring efforts.

EOWS Lacks Criteria on Continued Funding for Sites that Become Self-Sustaining

“EOWS has not developed criteria to determine when sites have become self-sustaining and when to reduce or withdraw Weed and Seed funds, even though the goal of sites becoming self-sustaining is central to the program.” (pg. 4)

“An important goal of the Weed and Seed Program is the self-sustainment of local Weed and Seed sites through the leveraging of additional resources from non-EOWS sources. However, EOWS has not developed criteria to determine (1) when sites have become self-sustaining and (2) when to reduce or withdraw Weed and Seed grant funds.” (pg. 19)

“While self-sustainability is an important goal of the Weed and Seed Program, EOWS has not developed specific criteria to determine when sites have become self-sustaining or determined the progress sites had made toward achieving this goal.” (pg. 19)

“EOWS does not have criteria for determining whether or the extent to which a site has become self-sustaining...” (pg. 21)

“EOWS lacks an adequate internal control that requires that the basis and rationale for new and existing Weed and Seed site qualification for funding decisions always be fully documented.” (pg. 26)

We believe the report’s assertion regarding the lack of criteria for determining when a site becomes self-sustaining is misleading. Sustainment of a Weed and Seed strategy can only be truly determined when the grant funding lapses. Grantees cannot be expected to provide the documentation highlighting their successes that will result in the termination of their funding. The original 21 grantees were required within 4 years of funding to expand to additional sites/neighborhoods. This rule created an expectation of self-sustainment for their current neighborhood sites. For all current grantees, there is a 5 year rule requiring these grantees to shift grant fund resources to different sites after 5 years of funding, once again based on an expectation of self-sustainment.

Appendix IV
Comments From the Department of Justice

Richard M. Stana, Page No. 8

An important goal of the Weed and Seed Program is self-sustainment, meaning that Weed and Seed neighborhoods over time will be able to sustain their crime reduction and community rebuilding efforts without the need for Federal funding. As noted in the draft report, sites with the assistance of EOWS have generally become quite effective in leveraging their Federal resources and forming partnerships with both public and private sources. Community-based initiatives targeted to low income neighborhoods have traditionally experienced sustainment problems once the Federal funds terminate. To address this problem, EOWS, through its technical assistance and training, stress the importance of leveraging and forging partnerships from the onset of funding.

EOWS recognized that self-sustainment is more likely when the Federal funding levels are not significant at the start of a program. Four years ago, EOWS dramatically reduced program funding levels per grant so that from the very onset of the program, sites would find it necessary to leverage resources and forge partnerships to meet their program objectives. In spite of the funding reductions in many sites, programs flourished and even more ambitious strategies were implemented.

EOWS also recognizes the difficulty in determining when a site has indeed reached that point when it can sustain its crime reduction and community re-building efforts without further assistance from the Federal government. High crime, low income areas face continuous challenges in their efforts to thwart criminal activity and create safe and more prosperous communities. With the lapse of Federal dollars to support those efforts, these communities often find it difficult to replace Federal funding with local dollars, especially those communities experiencing low tax bases and severe poverty. However, through partnerships and the building of local support from other government sources, many sites have expanded their crime reduction strategies and established the basis for their continuation, absent Federal dollars.

Within four years of funding, the 21 initial Weed and Seed grantees were required to expand into additional neighborhood sites. It was believed that some level of self-sustainment could be assumed, and therefore these grantees were required to expend their Weed and Seed grant dollars to launch initiatives in other neighborhood sites. In 1999, EOWS adopted a five year rule that limits Weed and Seed grant funding to a recipient neighborhood to five years, absent compelling justification. This rule was put in place to further motivate sites to strive for self sustainment.

The draft report criticizes EOWS for not developing criteria to determine when a site has become self-sustaining. While we can and do monitor the extent to which a site develops

See comment 3.

Richard M. Stana, Page No. 9

successful partnerships and additional local government support to implement its Weed and Seed strategy (e.g. site summaries and activities), determining the level at which these same activities would be funded without the Federal dollars to leverage is problematic and often a question one is unable to answer until the Federal funding actually lapses.

The draft report is incorrect in its assertion that no site's funding has been reduced or withdrawn as a result of its efforts to become self-sustaining. The original 21 grantees, within 4 years of funding, were required to reduce the funding levels in their initial sites because of a requirement to expand into additional neighborhood sites. During 1999, the remaining grantees who have received at least four years of funding, and once again the initial 21 grantees will be required to shift their efforts to additional neighborhood sites. This rule is based on an expectation of self-sustainment after 5 years of Federal funding. GAO appears to have confused grantees with sites. For example, the city of San Jose, as the grantee, has been the ongoing recipient of Weed and Seed funding, but its distribution of those funds to neighborhoods has varied over time. As one neighborhood reached a point where it could sustain its Weed and Seed crime reduction efforts, funds and resources were shifted to other neighborhoods, as required. This practice is a required condition of funding for the original 21 sites, and will be required for the remaining Weed and Seed sites. We request revisions to the report to accurately reflect that EOWS has required grantees to reduce funding in existing sites and shift those resources to other neighborhood sites and that in fact, most grantees have done so.

OJP/EOWS Request for Changes to the Final Report

We request that the title of this finding in the final report be changed to "EOWS Requires Weed and Seed Grant Recipients to Shift Funding to New Sites After 5 Years of Funding," as noted above. Consistent with the change in title, we also request the finding be revised to focus on the EOWS requirement that grantees shift funding to additional sites after 5 years, thus, requiring originally funded sites to become self-sustaining.

EOWS and Weed and Seed Sites' Performance Indicators Did Not Measure Program Success

"EOWS' performance indicators generally did not measure program results." (pg. 4)

We believe the report's comments and assertions regarding the lack of results oriented performance measures is a clear indication of a lack of understanding of the Weed and Seed Program's operations. The focus of the Program is implementation of a neighborhood

Richard M. Stana, Page No. 10

strategy. The mission of Weed and Seed is to reduce crime and improve the quality of life in a pre-determined designated area. Relying on data protocols developed by expert criminal justice researchers, our performance measures focus on measures of crime at the neighborhood level. For EOWS, there is no performance measure more important than the incidence of crime.

A recently completed impact evaluation of Weed and Seed sites that addressed methodological concerns raised by the draft report was provided in draft to the GAO evaluators; however, this important study was not referenced at all in the draft report. This evaluation found significant favorable effects of Weed and Seed on key outcome measures for some sites and time periods.

EOWS conceptualized Weed and Seed as first and foremost a strategy that emphasizes the implementation of a collaborative effort to reduce crime and improve the quality of life in a designated neighborhood. The point of intervention is the neighborhood. Success of the program is therefore defined by what changes transpire at the neighborhood level. EOWS has invested extensive resources in efforts to both test the efficacy of the Weed and Seed model, and to track crime and crime related indicators at the neighborhood level in each of the sites. In addition, EOWS, as noted in the draft report, collects and analyzes extensive data encompassing program activities.

We disagree with GAO's assertion that EOWS performance indicators generally did not measure program results. The National Institute of Justice (NIJ) contracted with an independent research group to intensively study a variety of Weed and Seed sites to determine the program's impact on communities. These studies cost over one million dollars and were conducted by some of the nation's leading criminal justice researchers. These studies were also designed to test the impact of the Weed and Seed model with a focus on outcome (or result) measures. The draft of this impact study was shared with the GAO evaluators, but surprisingly was not mentioned in the draft report. We have included the summary findings as an attachment to this response (Attachment II). In this study, the primary measure of impact was crime--clearly an outcome measure. EOWS, following the advice of these highly regarded researchers, routinely collects crime data from all of its sites as a performance indicator, recognizing some of the cause- effect limitations in our interpretation of findings. We request that the report be revised to include the results of this impact study.

The suggestion by GAO to routinely do impact assessments of program components (e.g. measuring impact of Safe Havens on academic performance) is clearly unrealistic given the cost of conducting impact studies. Such studies often require control groups and other

See comment 4.

See comment 4.

Richard M. Stana, Page No. 11

expensive methodologies needed to minimize measurement error. To routinely perform impact assessments on all program components in all sites would not be cost effective and would require the preponderance of the grant dollars available. This is why researchers who analyze programs such as Weed and Seed rely on random samples and test the “model,” believing in the generalization of the findings.

Understanding that new technologies may allow us to develop extensive base line data encompassing a Weed and Seed designated area, we are hoping in the future to be able track changes along an array of relevant socio-demographic dimensions in a given neighborhood over time (remembering that the neighborhood for Weed and Seed is the focus). These dimensions include truancy rates, percentage of home owners, teenage pregnancies, unemployment, etc. Matching Weed and Seed interventions to neighborhood changes encompassing a wide range of variables would certainly help us do a better job at assessing program impact and measuring results. EOWS will be asking for an addition to our 2001 budget to address this need.

See comment 5.

Finally, GAO surveyed Weed and Seed sites and collected data concerning the extent to which sites have leveraged their Weed and Seed resources to support their strategy as the Program calls for. The findings from their surveys indicate a great deal of satisfaction with how the Program is managed and the positive impact it is having in their respective communities. The data also confirmed that sites are leveraging these Federal grant dollars as the Program intended to implement a broad range of crime reduction and crime prevention initiatives. These findings are not highlighted in the GAO summary of results, nor are they adequately covered in the body of the draft report. We request this information be the lead item in the “Results in Brief” section of the final report, and be further expanded upon within the body of the report.

OJP/EOWS Request for Changes to the Final Report

See comment 1.

We request that the title of this finding in the final report be changed to “EOWS and Weed and Seed Sites Use Reported Crime Statistics to Measure Program Performance.” We also request that the finding be revised to reflect that crime statistics are an appropriate measure of Weed and Seed Program success, as noted by top criminal justice researchers in the attached NIJ impact evaluation on the Weed and Seed Program.

Richard M. Stana, Page No. 12

Recommendations

We recommend that the Attorney General of the United States direct the Director of the Executive Office of Weed and Seed to:

1. *“develop an adequate internal control to ensure the basis and rationale for new and existing site qualification for funding decisions are always fully documented”*

EOWS, when faced with a situation of having to qualify sites to apply for funding in a competitive situation, will fully document this process. EOWS already has internal controls in place to ensure that site selection and funding decisions are based on criteria and are appropriately documented. Internal controls are in place to ensure awards are made in accordance with Office of Management and Budget (OMB) and OJP policies. Additionally, internal controls are established and documented for Official Recognition of Weed and Seed sites. This process is separate and apart from funding decisions. This is also separate from OJP policies and clearly unique to EOWS.

OJP/EOWS Request for Changes to the Final Report

As previously noted, we request the final report be revised to reflect the controls that for years have been in place to document program management and funding decisions. Additionally, we request the recommendation be revised to read “More fully document the funding eligibility decisions.”

2. *“improve program monitoring to ensure that sites meet grant requirements, such as having required activities and submitting program reports, and EOWS site visits are documented”*

EOWS has increased staff to help alleviate the high workload of each program manager. The reduction of the workload will assist in providing for more timely documentation of grant monitoring. All site monitoring visits reports are now up to date. We request this corrective action be included in the final report.

OJP/EOWS Request for Changes to the Final Report

As previously noted, we request the final report be revised to reflect the monitoring controls currently in place to ensure grantees submit the required FSRs.

See comment 6.

Richard M. Stana, Page No. 13

3. *“develop criteria for determining when sites are self-sustaining and when to reduce or withdraw program funding”*

A quantifiable measure to determine self-sustainment of sites is problematic. In lieu of a measure, EOWS has instituted a policy requiring sites to deploy Weed and Seed grant funds in a different neighborhood after a maximum of 5 years of funding. Similar procedures are in place for the original 36 sites. This rule provides an expectation of self-sustainment after 5 years. This policy is consistent with other multi-year federal grant programs.

OJP/EOWS Request for Changes to the Final Report

As previously noted, we request the final report be revised to focus on the EOWS requirement that grantees shift funding to new sites after 5 years, thus, requiring originally funded sites to become self-sustaining in that time period. Because of this requirement, criteria for determining when sites are self-sustaining is not necessary. As a result, we request this recommendation be omitted from the final report.

4. *“develop performance measures that track program outcomes”*

EOWS has in place performance measures that primarily focus on crime statistics and track program outcomes. The initial National Evaluation, conducted by an independent group of highly regarded researchers, has already been completed which analyzes the impact of the Weed and Seed model in designated neighborhoods (see enclosed Research in Brief). The primary measure of impact of the Weed and Seed Program was crime statistics.

Notwithstanding the above, EOWS recognizes the need to expand efforts to measure performance, including quality of life issues and other program outcomes. EOWS will seek appropriations in fiscal year 2001 to expand evaluation and performance measure efforts, to include use of socio-demographic indicators such as truancy rates, percentage of home owners, teenage pregnancies, unemployment, etc. We request these planned actions be noted in the final report.

OJP/EOWS Request for Changes to the Final Report

As EOWS and the independent researchers agree that crime statistics are an appropriate measure of Program performance, we request this recommendation be modified to state that EOWS should develop and utilize additional performance measures.

Appendix IV
Comments From the Department of Justice

Richard M. Stana, Page No. 14

Again, thank you for the opportunity to review and comment on this draft report. If you have any questions or would like to discuss our comments, please contact Denise Christodouloupoulos, OJP Audit Liaison, on (202) 616-5968.

Sincerely,



Laurie Robinson
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**Appendix IV
Comments From the Department of Justice**

Enclosure I

**1998-1999
Process to Become a Weed and Seed Grantee**

	<u>Step</u>	<u>Process</u>	<u>Documentation</u>
1.	U.S. Attorney convenes a Steering Committee to develop a Weed and Seed strategy for a potential site.	The U.S. Attorney initiates the process.	Memoranda and minutes generated by the U.S. Attorney and the Steering Committee members.
2.	Steering Committee develops a Weed and Seed strategy and applies for Official Recognition (O.R.) of that strategy.	Steering Committee uses EOWS guidelines for developing an application for O.R. and the EOWS Implementation Manual. Applicant for O.R. must submit application to EOWS by November to be considered by EOWS for inclusion in the Solicitation.	-Application for O.R. submitted to EOWS, including cover letter from U.S. Attorney. -Letter from EOWS acknowledging receipt of O.R. application.
3.	EOWS Review of O.R. Application.	EOWS assigns O.R. application for review by consultants and EOWS staff. Those reviews are reviewed by EOWS management.	-Consultant and Staff Review Sheets. -Director's Decision Sheet.
4.	EOWS Issues Solicitation for Applications for Funding ("Application Kit")	Based on Director's Decision, a site is listed in the Application Kit if: 1. It has received O.R. for its strategy; or 2. The Director determines that the site has a reasonable chance to complete O.R. requirements before funding is offered by letter from AAG/OJP.	Solicitation (Application Kit) issued typically in January.
5.	Submission of Application for Funding.	Applicant for funding completes required forms.	Application documents required in the Application Kit, including Standard Forms, Budget, and U.S. Attorney Certification. (See attached application checklist)
6.	Review of Application by EOWS staff	EOWS staff reviews application and discusses deficiencies with applicant and U.S. Attorney's Office.	-EOWS letter to applicant listing deficiencies and requesting supplemental submission by the applicant. -Supplemental submission by the applicant.
7.	Review of Applicants' Proposed Budget by OJP/ Office of the Comptroller (OC).	OC Staff reviews proposed budget for compliance with the OC Financial Guide and Applicable Laws and Regulations.	-OC Financial Guide. -OC Memo to EOWS on the results of Budget review.
8.	Award Certification	EOWS Staff assembles "Redbook" which circulates through OJP for Review and Approval.	"Redbook" contains: -application -Grant Manager's Memo -OC Budget Memo -Grant Award Offer letter and documents containing special conditions of award. -Checkoff sheet for EOWS staff and managers approval.
9.	Acceptance of Award by Grantee	Applicant Accepts award and conditions of award by signing award documents and returning them to OJP.	Award Document signed by grantee as well as OJP officials

The following are GAO's comments on the Department of Justice letter dated July 1, 1999.

GAO Comments

1. DOJ suggested that (1) our report title should be changed to reflect our mandate to review the efficiency and effectiveness of the Weed and Seed Program and (2) some of our report captions should be modified. We believe our report title and captions better convey the message of our report, therefore, we made no modifications.
2. DOJ stated that the Grant Manager's Memoranda outline the basis and rationale for funding decisions. Our review of the Grant Manager's Memoranda showed that they did not provide a basis and rationale for funding decisions but rather provided a project overview, including purpose, goals and objectives, strategy, and project management. Further, EOWS management officials told us the narrative on this form is the same for all grantees; therefore, we do not believe these memoranda communicate the basis and rationale for qualifying new and existing sites for funding.
3. DOJ stated that we are suggesting that it routinely perform impact assessments of program components. We are not suggesting that EOWS routinely perform impact assessments. Our statement is meant as an example of a possible outcome measure.
4. DOJ stated that our report did not appropriately highlight positive program results. However, in the results in brief section we note that selected sites had taken actions toward self-sustainment as well as highlight the satisfaction that most local officials had with the activities funded by Weed and Seed. These results are discussed in greater detail in the body of this report. In addition, our survey results, in their entirety, are included in appendix II of the report.
5. DOJ requested that the final report be revised to reflect the controls that for years have been in place to document program management and funding decisions. We did not make this change for the reasons discussed in the agency comments section of this report.

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