UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF SAFE AND DRUG-FREE SCHOOLS

MAR 1 2010

Honorable R. Gil Kerlikowske
Director
Office of National Drug Control Policy
Executive Office of the President
Washington, D.C. 20500

Dear Director Kerlikowske:

In accordance with the Office of National Drug Control Policy (ONDCP) Circular *Drug Control Accounting*, enclosed please find detailed information about performance-related measures for key drug control programs administered by the U.S. Department of Education contained in the *U.S. Department of Education's Performance Summary Report for Fiscal Year 2009*, along with the Department of Education Assistant Inspector General's authentication of the management assertions included in that report.

Please do not hesitate to contact me if you have any questions about this information.

Sincerely,

Kevin Jennings
Assistant Deputy Secretary

Enclosure #1: Department of Education Performance Summary Report for Fiscal Year 2009, dated February 19, 2010

Enclosure #2: Authentication letter from Keith West, Assistant Inspector General for Audit Services, dated February 25, 2010

cc: Keith West

Department of Education

Performance Summary Report

Fiscal Year 2009

In Support of the

National Drug Control Strategy

As required by ONDCP Circular: *Drug Control Accounting*

February 19, 2010

Department of Education

Performance Summary Report for Fiscal Year 2009

TABLE OF CONTENTS

Transmittal Letter 1

Performance Summary Information 2

Safe Schools/Healthy Students 2

Student Drug Testing 7

Safe and Drug-Free Schools and Communities State Grants Program 16

Grants to Reduce Alcohol Abuse 23

Assertions 32

Performance Reporting System 26

Methodology for Establishing Performance Targets 33

Performance Measures for Significant Drug Control Activities 33

Criteria for Assertions 33

UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF SAFE AND DRUG-FREE SCHOOLS

ASSISTANT DEPUTY SECRETARY

Ms. Mary Mitchelson
Inspector General (Acting)
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, DC 20202-1510

Dear Ms. Mitchelson:

As required by Office of National Drug Control Policy (ONDCP) Circular *Drug Control Accounting*, enclosed please find detailed information about performance-related measures for key drug control programs administered by the U.S. Department of Education, in accordance with the guidelines in the circular dated May 1, 2007. This information covers the Safe and Drug-Free Schools and Communities program, which is the Department's only Drug Control Budget Decision Unit displayed in the *National Drug Control Budget Summary*.

Consistent with the instructions in the ONDCP Circular, please provide your authentication to me in writing and I will transmit it to ONDCP along with the enclosed Performance Summary Report. As you know, ONDCP requests these documents by March 1, 2010 if possible. Please do not hesitate to contact me if you have any questions about the enclosed information.

Sincerely,

Kevin Jennings

Performance Summary Information

Safe Schools/Healthy Students

Measure 1: The percentage of grantees demonstrating a decrease in substance abuse over the three-year grant period. (Safe Schools/Healthy Students – FY 2005, and 2006 cohorts)

Table 1

Cohort	FY 2005 Actual	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009 Target	FY 2009 Actual	FY 2010 Target
2005	n/a	n/a	43.75	34.2	86.25	pending	n/a
2006	n/a	n/a		66.67	76.67	pending	80.0

The measure. This performance measure is for the Safe Schools/Healthy Students initiative, a joint project of the Departments of Education, Health and Human Services, and Justice. The initiative provides grants to local educational agencies (LEAs) to support the development and implementation of a comprehensive plan designed to prevent student drug use and violence and support healthy youth development.

This measure, one of four for this initiative for the 2004, 2005, and 2006 cohorts, focuses on one of the primary purposes of the initiative – reduced student drug use. The initiative and this measure, are directly related to the National Drug Control Strategy's goal of preventing drug use before it begins. Grantees select and report on one or more measures of prevalence of drug use for students. For the FY 2004 – 2006 cohorts, the items selected by grantees to respond to this measure are not common across grant sites but, rather, reflect priority drug use problems identified by sites.

FY 2009 Performance Results. Sites were not required to provide or collect baseline data at the time of application or before program interventions were implemented, so grantees provide baseline data for their selected measures related to drug use after year one (for example in FY 2005 for the FY 2004 cohort). Grantees from the FY 2005 cohort generally completed no-cost extensions and are providing GPRA data in final grantee reports that were due at the end of December 2009. Those data will be aggregated later in FY 2010 to determine if the FY 2009 target for the cohort has been met. The FY 2006 cohort of grantees received no-cost extensions during FY 2009. Final GPRA data for this cohort will be submitted at the end of December 2010. FY 2009 data for the FY 2006 cohort have been received and are being aggregated, but are not yet available for inclusion in this summary report.

FY 2010 Performance Targets. Targets for the two earliest cohorts were initially established before any performance data for this measure were received, and

represented our best judgment at the time, given the significant size of SS/HS grants and the emphasis on research-based programs that is central to the initiative. We elected in 2008 to revise the target for the FY 2005 cohort for this measure based on the actual performance to date (implementation year two) of the FY 2004 cohort. Based on our professional judgment, it seemed that the revised target of 86.25 percent was appropriately aggressive and that attaining that target would be a meaningful outcome for the program, while acknowledging that our original target of 90 percent for the initial (FY 2004) cohort may have been unrealistic. In 2008 we also developed revised targets for the FY 2006 cohort, again, based on the limited data available for this measure. We have made no additional revisions to targets for these cohorts at this time.

Our ability to establish appropriate targets for this program has also been impacted by challenges associated with the quality of data supplied by grant sites. Initially, a significant number of sites failed to provide valid data for this and some other SS/HS measures. Through technical assistance activities we have achieved some improvements in data quality for some sites, including significantly improved response rates for the 2005 and 2006 grant cohorts, but have not completed a full grant cycle with cohorts that have received early and more intensive technical assistance.

Subsequently, we have adopted revised GPRA measures for this initiative beginning with the FY 2007 cohort in order to address implementation challenges with the measure described above. Those revised GPRA measures for the program that are relevant to the National Drug Control are included as Measures 2 and 3 in this summary report.

Methodology. Data are collected by grantees, generally using student surveys. Data are furnished in the second of two semi-annual performance reports provided by grantees each project year. If grantees identified more than one measure of drug abuse or provided data for individual school-building types (for example, separate data for middle and high schools), grantees were considered to have experienced a decrease in substance abuse if data for a majority of measures provided reflected a decrease. If a grant site provided data for an even number of measures and half of those measures reflected a decrease and half reflected no change or an increase, that grant site was judged not to have demonstrated a decrease in substance abuse. While most sites were able to provide some data related to this measure, we considered as valid data only data from sites that used the same elements/items in each of two years. We considered a grant site to have experienced a decrease if data supplied reflected a decrease over baseline data provided.

The contractor for the SS/HS national evaluation is also using data for this measure as part of the program evaluation. The evaluation contractor reviews data submitted, and works with grantees to seek clarifying information and provide technical assistance if grantees are having difficulty in collecting or

reporting data for this measure. The contractor supplies data for the measure after it has completed data cleaning processes. If data for this measure are not available at the time that performance reports are submitted, staff follow up with sites to attempt to obtain data for the measure.

Grantees that fail to provide data are not included in the tabulation of data for the measures. Also, grantees that did not provide data for two consecutive project years (so that we could determine if a decrease in substance abuse had occurred) are not included in data reported for the measure. Authorized representatives for the grant site sign the annual performance report and, in doing so, certify that to the best of the signer's knowledge and belief, all data in the performance report are true and correct and that the report fully discloses all known weaknesses concerning the accuracy, reliability, and completeness of the data included. Generally, the Department relies on the certification concerning data supplied by grantees and does not conduct further reviews.

Targets were established for this measure after the baseline data for the FY 2004 cohort were provided. Based on more recent available data for this first cohort and subsequent cohorts, we adjusted targets. For example, the targets for the FY 2005 and 2006 cohorts were adjusted in 2008. We made no additional adjustments to these targets in FY 2009.

Measure 2: The percentage of SS/HS grantees that report a decrease in students who report current (30-day) marijuana use (SS/HS – FY 2007 and 2008 cohorts)

Table 2

Cohort	FY 2005 Actual	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009 Target	FY 2009 Actual	FY 2010 Target
2007	n/a	n/a	n/a	pending	pending	pending	pending
2008	n/a	n/a	n/a	n/a	pending	pending	pending

The measure. This performance measure is for the Safe Schools/Healthy Students initiative, a joint project of the Departments of Education, Health and Human Services, and Justice. The initiative provides grants to local educational agencies (LEAs) to support the development and implementation of a comprehensive plan designed to prevent student drug use and violence and support healthy youth development. Beginning with the FY 2007 cohort, the project period for SS/HS grants is 48 months.

This measure, one of six for this initiative for cohorts from FY 2007 and forward, focuses on one of the primary purposes of the initiative – reduced student drug use. The initiative and this measure are directly related to the National Drug Control Strategy's goal of preventing drug use before it begins.

FY 2009 Performance Results. Sites were asked to provide baseline data at the time of application or collect baseline data before program interventions were implemented. Generally, grantees from the FY 2007 cohort provided baseline and performance data in 2008, though some sites experienced significant delays in beginning implementation of interventions while they finalized partnership agreements, completed a project logic model, and developed an evaluation plan. Final data for 2008 (both baseline and year one data), as well as data for 2009, have been received and are being aggregated. Results for 2008 and 2009 will be reported in the 2010 report.

The FY 2008 cohort recently reported baseline and year one performance data. Those data are being reviewed as part of the aggregation process. Results will be reported in the 2010 report.

FY 2010 Performance Targets. We have not established targets for this measure for any cohort, pending aggregation of final 2008 and 2009 data for the FY 2007 cohort. We plan to establish targets for the 2007 and 2008 cohorts in 2010. At that time we'll review data received to date from these cohorts, as well as the results from similar measures in other OSDFS programs and information from the research literature about program effect size, in order to establish targets.

Methodology. Data are collected by grantees, generally using student surveys. Data are furnished in the second of two semi-annual performance reports provided by grantees each project year.

The contractor for the SS/HS national evaluation is also using data for this measure as part of the national program evaluation. The evaluation contractor reviews data submitted by grantees, and works with grantees to seek clarifying information and provide technical assistance if grantees are having difficulty in collecting or reporting data for this measure. The contractor supplies data for the measure after it has completed data cleaning processes. If data for this measure are not available at the time that performance reports are submitted, staff follow up with sites to attempt to obtain data for the measure.

Grantees that fail to provide data or that provide data that does not respond to the established measure are not included in the tabulation of data for the measures. Authorized representatives for the grant site sign the annual performance report and, in doing so, certify that to the best of the signer's knowledge and belief, all data in the performance report are true and correct and that the report fully discloses all known weaknesses concerning the accuracy, reliability, and completeness of the data included. Generally, the Department relies on the certification concerning data supplied by grantees and does not conduct further reviews.

We will establish targets for this measure when we have final baseline and performance data from at least one cohort.

Measure 3: The percentage of SS/HS grantees that report a decrease in students who report current (30-day) alcohol use (SS/HS – FY 2007 and 2008 cohorts)

Table 3

Cohort	FY 2005 Actual	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009 Target	FY 2009 Actual	FY 2010 Target
2007	n/a	n/a	n/a	pending	pending	pending	pending
2008	n/a	n/a	n/a	n/a	pending	pending	pending

The measure. This performance measure is for the Safe Schools/Healthy Students initiative, a joint project of the Departments of Education, Health and Human Services, and Justice. The initiative provides grants to local educational agencies (LEAs) to support the development and implementation of a comprehensive plan designed to prevent student drug use and violence and support healthy youth development. Beginning with the FY 2007 cohort, the project period for SS/HS grants is 48 months.

This measure, one of six for this initiative for cohorts from FY 2007 and forward, focuses on prevalence of alcohol use. While the National Drug Control Strategy is focused most intensively on preventing the use of controlled substances, the strategy does address the role of alcohol as a drug of choice for teenagers. Data do suggest that early use of alcohol is more likely to result in heavy later use of alcohol. The initiative and this measure, are directly related to the National Drug Control Strategy's goal of preventing drug use before it begins.

FY 2009 Performance Results. Sites were asked to provide baseline data at the time of application or collect baseline data before program interventions were implemented. Generally, grantees from the FY 2007 cohort provided baseline and performance data in 2008, though some sites experienced significant delays in beginning implementation of interventions while they finalized partnership agreements, completed a project logic model, and developed an evaluation plan. Final data for 2008 (both baseline and year one data), as well as data for 2009 have been received and are being aggregated. Results for 2008 and 2009 will be reported in the 2010 report.

The FY 2008 cohort recently reported baseline and year one performance data. That data is being reviewed as part of the aggregation process. Results will be reported in the 2010 report.

FY 2010 Performance Targets. We have not established targets for this measure for any cohort, pending aggregation of final 2008 and 2009 data for the FY 2007 cohort. We plan to establish targets for the 2007 and 2008 cohorts in 2010. At that time we'll review data received to date from these cohorts, as well as the results from similar measures in other OSDFS programs and information from the research literature about program effect size,, in order to establish targets.

Methodology. Data are collected by grantees, generally using student surveys. Data are furnished in the second of two semi-annual performance reports provided by grantees each project year.

The contractor for the SS/HS national evaluation is also using data for this measure as part of the national program evaluation. The evaluation contractor reviews data submitted by grantees, and works with grantees to seek clarifying information and provide technical assistance if grantees are having difficulty in collecting or reporting data for this measure. The contractor supplies data for the measure after it has completed data cleaning processes. If data for this measure are not available at the time that performance reports are submitted, staff follow up with sites to attempt to obtain data for the measure.

Grantees that fail to provide data or that provide data that does not respond to the established measure are not included in the tabulation of data for the measures. Authorized representatives for the grant site sign the annual performance report and, in doing so, certify that to the best of the signer's knowledge and belief, all data in the performance report are true and correct and that the report fully discloses all known weaknesses concerning the accuracy, reliability, and completeness of the data included. Generally, the Department relies on the certification concerning data supplied by grantees and does not conduct further reviews.

We have delayed in establishing targets for this measure until we have final baseline and performance data from at least one cohort.

Student Drug Testing

Measure 4: The percentage of student drug testing grantees that experience a 5 percent reduction in current (30-day) illegal drug use by students in the target population. (Student Drug Testing – FY 2005, 2006, 2007, and 2008 cohorts)

Table 4

Cohort	FY 2005 Actual	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009 Target	FY 2009 Actual	FY 2010 Target
2005	n/a	n/a	no valid	no valid	n/a	n/a	n/a

			data available	data available			
2006	n/a	n/a	n/a	66.67	70	12.5	70
2007	n/a	n/a	n/a	established baseline	50	41.7	60
2008	n/a	n/a	n/a	n/a	33	48.8	50

The measure. This measure is one of two measures for the Student Drug-Testing Programs grant competition. The competition provides discretionary grants to LEAs, community-based organizations, or other public and private entities to support implementation of drug testing of students, consistent with the parameters established by the U.S. Supreme Court or for students and their families that voluntarily agree to participate in the student drug testing program.

This measure is directly related to the National Drug Control Strategy's goal related to preventing drug use before it starts. Student drug testing was been prominently featured in the 2009 version of the strategy as a recommended drug prevention intervention.

FY 2009 Performance Results. FY 2009 performance data for the FY 2006, 2007, and 2008 cohorts are included in the chart for this measure above.

During FY 2008 we completed a review of data submitted to date by the FY 2005 cohort for this measure and identified significant concerns about the quality and comparability of the data. Grant sites have reported on prevalence rates for a variety of illegal drugs and did not always provide data from the same items/elements across project years one and two. Also, some sites surveyed their entire student population and others surveyed only students in the testing pool.

Based on these concerns, we obtained assistance from the U.S. Department of Education's Data Quality Initiative contractor. With the contractor's help, we created and disseminated detailed data collection and reporting guidance for the program, as well as data standards that we will use to determine what constitutes valid data for this measure. We disseminated this guidance to FY 2007 grantees during project implementation, but were able to provide the guidance to the new cohort of 2008 grantees at the start of their projects. Based on that guidance, as well as data quality and aggregation checks, in FY 2009 we aggregated available data from the FY 2007 and 2008 cohorts and recorded those data in the Department's software that houses GPRA measures and data.

Data for the FY 2006 cohort come from the evaluation being conducted for the Department of Education by a contractor. Data for this cohort were collected by the contractor annually; the data reported in the chart above reflects the progress of cohort grant sites based on aggregate information at the grantee level about changes in prevalence of drug use among each grantee's students surveyed by

the contractor. Based on the performance data for this measure for the FY 2006 cohort collected and reported in FY 2008, we revised the established 2009 target (60 percent) to 70 percent of grant sites

Because of the concerns about data quality discussed previously, including receiving valid data from only a small percentage of grantees in the cohort, no aggregate data for the FY 2005 can be provided.

It is difficult to assess why performance results for the 2006 and 2007 cohorts fell short of the established targets for this measure. We have carefully considered performance reports submitted by grantees, as well as our experience in monitoring and providing technical assistance to grantees, and have identified some challenges that may have impeded grant performance. Some common problems include turnover in leadership (at the school board, authorized representative or project director level) and challenges with collecting and reporting valid data about the measure. Another variable that might affect performance in sites is related to project design. For example, we're not certain how to assess the likely impact of a random student drug testing intervention on students that volunteer to be included in the testing pool, versus students who are forced to be tested as a condition of participation in extracurricular activities. Finally, cohort size and composition varies from cohort to cohort. In some years funding for a large amount of new awards is available and in others only a handful of sites will receive grants. To the extent that our peer review results that are used to rank order applications and select grantees accurately predict project quality, the range of scores funded (and perhaps the range of project quality) varies from fiscal year to fiscal year.

We believe that an equally important dimension in assessing performance against established targets for this measure is our ability to correctly predict targets for measures. Because there is limited available research and no "industry" standard available to guide expectations for performance, generally we have used the performance of prior cohorts on the measure to establish targets for subsequent cohorts. Because of the need to establish targets for future cohorts before a single cohort has completed project implementation and submitted final data, we have based targets on information provided over a fairly limited amount of time, often reflecting the results of less than a single cohort of complete performance information. Initial challenges with data quality also resulted in situations where only a limited number of grantees in a cohort were able to provide valid performance data. This situation introduced two possible problems into the target setting process – that targets are being based in some part on a subset of grantees that are not representative of the cohort as a whole, and that those sites able to provide valid data more quickly may also have superior capacity to effectively implement program interventions. While we have placed a significant emphasis on improving data quality and have worked to improve the response rates for measures over the life of the cohort, this causes performance results from a relatively small set of grantees in year one to be

compared to results for a significantly larger percentage of the cohort by the end of project.

Increasingly, it is clear that a series of variables serve to make each cohort unique, and that the issue of how we have established targets for this measure has been problematic. Revised processes for establishing targets for this measure are discussed in the FY 2010 Performance Targets section below.

FY 2010 Performance Targets. We established targets for the percentage of grantees experiencing a 5 percent reduction in current illegal drug use after reviewing the first two years of data for the FY 2003 cohort of grant sites. Consistent with research that suggests that changes in student behavior related to student drug testing may not be realized immediately, we assumed that we could look for an increased number of grantees to experience positive change and, using our professional judgment, set that target at 50 percent of grantees. We have since received data for three project years from this single cohort of sites (the FY 2003 cohort), and the information provided by the grantees does not provide an adequate basis for revisiting targets for future cohorts. This cohort was very small (eight grantees), and also experienced extensive delays in implementation and data collection activities. Because only a handful of grantees were able to eventually provide data specific to the measure, we do not believe that it would be appropriate to base expectations about the performance of other cohorts on this limited information.

Similar problems with data quality for the FY 2005 cohort of grant sites mean that data from that cohort will not be helpful in determining if targets for the program will need to be readjusted. Challenges with data quality have resulted in only a very limited proportion of grant sites that provided approximately comparable data. Conversely, because the data from the evaluation are being collected by a contractor using comparable survey items and collection procedures (in contrast to the varying procedures used by individual grant sites in the other cohorts), data for the 2006 cohort similarly do not provide an appropriate basis for making adjustments in existing targets under the program. Performance for the FY 2006 cohort declined significantly from the FY 2008 level, but the reasons for the decrease are not clear. As a result, we have retained the established targets for this measure at this time.

Given these challenges, and improvements we have made in data quality (including generally requiring grantees to collect baseline data for their projects before interventions are implemented), we intend to modify our process for establishing targets. While prior cohort performance may provide some insights about general patterns of performance that we can incorporate into our targeting setting processes, for any future cohorts for this program we will establish numerical performance targets after baseline data is received for the new cohort. We will enter these targets into the Department's Visual Performance System (VPS) as "administrative" targets (for example, baseline plus 5 percent), and then

convert the targets to numerical targets after baseline data is collected and aggregated. We believe that this process revision will help us better match targets to cohort performance.

Methodology With the exception of the FY 2006 cohort, data are collected by grantees using student surveys. Data are provided as part of the grantees' annual performance reports. Generally, grantees do not use the same survey items to collect data for this measure but, rather, self-select survey items (often from surveys already administered) in order to provide these data. Survey items may relate to different substances, but must collect information concerning current use in order to be included in the data reported for this measure. Beginning with the FY 2008 cohort, we asked grantees to provide data for current (prior 30-day) use of marijuana. Grantees did not provide baseline data in their applications, so we have to wait until grantees provide data both from project year one and two in order to determine if they have experienced a decrease in substance abuse. Beginning with the FY 2008 cohort, we instructed grantees to collect baseline data for this measure before beginning implementation of their student drug testing program.

The FY 2005 cohort of grant sites has provided data for FY 2006 and 2007, but only a small percentage of grant sites provided valid data for the measure. Many sites requested and received no-cost extensions for their projects, and data for this measure is included in final reports due at the end of December 2009. Significant data quality issues (including inconsistent use of survey items and changes in respondent populations) affect the majority of grant sites in the cohort, resulting in no valid data for this cohort.

Authorized representatives for the grant site sign the annual performance report and, in doing so, certify that to the best of the signer's knowledge and belief, all data in the performance report are true and correct and that the report fully discloses all known weaknesses concerning the accuracy, reliability, and completeness of the data included. Generally, the Department relies on the certification concerning data supplied by grantees and does not conduct further reviews.

Data for the FY 2006 cohort are being collected as part of an evaluation of student drug testing. Data for the measures are being collected by the evaluation contractor, using common survey items and collection procedures. Survey responses are analyzed by the contractor and data are provided to the Department.

The anticipated levels of decrease in substance abuse are consistent with the national goals for the reduction of underage drug use included in the National Drug Control Strategy in effect when SDT grants were awarded– five percent per year. Targets were initially established following the report of baseline data for grant sites from the FY 2003 cohort. As discussed above, we do not currently

have data of sufficient quality to support adjustment of targets for this program at this time.

Measure 5: The percentage of student drug testing grantees that experience a 5 percent reduction in past-year illegal drug use by students in the target population. (Student Drug Testing – FY 2005, 2006, 2007 and 2008 cohorts)

Table 5

Cohort	FY 2005 Actual	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009 Target	FY 2009 Actual	FY 2010 Target
2005	n/a	n/a	no valid data available	no valid data available	n/a	n/a	n/a
2006	n/a	n/a	n/a	55.5	60	12.5	60
2007	n/a	n/a	n/a	established baseline	50	33.3	60
2008	n/a	n/a	n/a	n/a	33	57.5	60

The measure. This measure is one of two measures for the Student Drug-Testing Programs grant competition. The competition provides discretionary grants to LEAs, community-based organizations, or other public and private entities to support implementation of drug testing of students, consistent with the parameters established by the U.S. Supreme Court or for students and their families that voluntarily agree to participate in the student drug testing program.

This measure is directly related to the National Drug Control Strategy's goal related to preventing drug use before it starts. Student drug testing was prominently featured in annual editions of the National Drug Control Strategy between 2003 and 2009 as a recommended drug prevention intervention.

FY 2009 Performance Results. FY 2009 performance data for the FY 2006, 2007, and 2008 cohorts are included in the chart for this measure above.

During FY 2008 we completed a preliminary review of data submitted to date by the FY 2005 cohort for this measure and identified significant concerns about the quality and comparability of the data. Grant sites have reported on prevalence rates for a variety of illegal drugs and have not always provided data from the same items/elements across project years one and two. Also, some sites surveyed their entire student population and others surveyed only students in the testing pool.

Based on these concerns, we obtained assistance from the U.S. Department of Education's Data Quality Initiative contractor. With the contractor's help, we created and disseminated detailed data collection and reporting guidance for the

program, as well as data standards that we will use to determine what constitutes valid data for this measure. We disseminated this guidance to FY 2007 grantees during project implementation, but were able to provide the guidance to the new cohort of 2008 grantees at the start of their projects. Based on that guidance, as well as data quality and aggregation checks, in FY 2009 we aggregated available data from the FY 2007 and FY 2008 cohorts and recorded those data in the Department's software that houses GPRA measures and data.

Data for the FY 2006 cohort come from the evaluation being conducted for the Department of Education by a contractor.. Data for this cohort were collected by the contractor annually; the data reported in the chart above reflects the progress of cohort grant sites based on aggregate information at the grantee level about changes in prevalence of drug use among each grantee's students surveyed by the contractor. An important note is that data supplied for the measure for the 2006 cohort represents student drug use in the six months prior to the survey (rather than the one-year period called for in the measure.)

Because of the concerns about data quality discussed previously, including receiving valid data from only a small percentage of grantees in the cohort, no aggregate data for the FY 2005 can be provided.

It is difficult to assess why performance results for the 2006 and 2007 cohorts fell short of the established targets for this measure. We have carefully considered performance reports submitted by grantees, as well as our experience in monitoring and providing technical assistance to grantees, and have identified some challenges that may have impeded grant performance. Some common problems include turnover in leadership (at the school board, authorized representative or project director level) and challenges with collecting and reporting valid data about the measure. Another variable that might affect performance in sites is related to project design. For example, we're not certain how to assess the likely impact of a random student drug testing intervention on students that volunteer to be included in the testing pool, versus students who are forced to be tested as a condition of participation in extracurricular activities. Finally, cohort size and composition varies from cohort to cohort. In some years funding for a large amount of new awards is available and in others only a handful of sites will receive grants. To the extent that our peer review results that are used to rank order applications and select grantees accurately predict project quality, the range of scores funded (and perhaps the range of project quality) varies from fiscal year to fiscal year.

We believe that an equally important dimension in assessing performance against established targets for this measure is our ability to correctly predict targets for measures. Because there is limited available research and no "industry" standard available to guide expectations for performance, generally we have used the performance of prior cohorts on the measure to establish targets for subsequent cohorts. Because of the need to establish targets for

future cohorts before a single cohort has completed project implementation and submitted final data, we have based targets on information provided over a fairly limited amount of time, often reflecting the results of less than a single cohort of complete performance information. Initial challenges with data quality also resulted in situations where only a limited number of grantees in a cohort were able to provide valid performance data. This situation introduced two possible problems into the target setting process – that targets are being based in some part on a subset of grantees that are not representative of the cohort as a whole, and that those sites able to provide valid data more quickly may also have superior capacity to effectively implement program interventions. While we have placed a significant emphasis on improving data quality and have worked to improve the response rates for measures over the life of the cohort, this causes performance results from a relatively small set of grantees in year one to be compared to results for a significantly larger percentage of the cohort by the end of project.

Increasingly, it is clear that a series of variables serve to make each cohort unique, and that the issue of how we have established targets for this measure has been problematic. Revised processes for establishing targets for this measure are discussed in the FY 2010 Performance Targets section below.

FY 2010 Performance Targets. We established targets for the percentage of grantees experiencing a 5 percent reduction in annual illegal drug use after reviewing the first two years of data for the FY 2003 cohort of grant sites. Consistent with research that suggests that changes in student behavior related to student drug testing may not be realized immediately, we assumed that we could look for an increased number of grantees to experience positive change and, using our professional judgment, set that target at 50 percent of grantees. We have since received data for three project years from this single cohort of sites (the FY 2003 cohort), and the information provided by the grantees does not provide an adequate basis for revisiting targets for future cohorts. This cohort was very small (eight grantees), and also experienced extensive delays in implementation and data collection activities. Because only a handful of grantees were able to eventually provide data specific to the measure, we do not believe that it would be appropriate to base expectations about the performance of other cohorts on this limited information.

Similar problems with data quality for the FY 2005 cohort of grant sites mean that data from that cohort will not be helpful in determining if targets for the program will need to be readjusted. Challenges with data quality have resulted in only a very limited proportion of grant sites that provided approximately comparable data. Conversely, because the data from the evaluation are being collected by the contractor using comparable survey items and collection procedures (in contrast to the varying procedures used by individual grant sites in the other cohorts), data for the 2006 cohort similarly do not provide an appropriate basis for making adjustments in existing targets under the program for the FY 2007

cohort. As a result, we have retained the established targets for this measure at this time.

Given these challenges, and improvements we have made in data quality (including generally requiring grantees to collect baseline data for their projects before interventions are implemented), we intend to modify our process for establishing targets. While prior cohort performance may provide some insights about general patterns of performance that we can incorporate into our targeting setting processes, for any future cohorts for this program we will establish numerical performance targets after baseline data is received for the new cohort. We will enter these targets into the Department's Visual Performance System (VPS) as "administrative" targets (for example, baseline plus 5 percent), and then convert the targets to numerical targets after baseline data is collected and aggregated. We believe that this process revision will help us better match targets to cohort performance.

Methodology With the exception of the FY 2006 cohort, data are collected by grantees using student surveys. Data are provided as part of the grantees' annual performance reports. Generally, grantees do not use the same survey items to collect data for this measure but, rather, self-select survey items (often from surveys already administered) in order to provide these data. Survey items may relate to different substances, but must collect information concerning annual use in order to be included in the data reported for this measure. Beginning with the FY 2008 cohort, we asked grantees to provide data for annual (prior year) use of marijuana. Grantees did not provide baseline data in their applications, so we have to wait until grantees provide data both from project year one and two in order to determine if they have experienced a decrease in substance abuse. Beginning with the FY 2008 cohort, we instructed grantees to collect baseline data for this measure before beginning implementation of their student drug testing program.

The FY 2005 cohort of grant sites has provided data for FY 2006 and 2007, but only a small percentage of grant sites provided valid data for the measure. Many sites requested and received no-cost extensions for their projects, and data for this measure is included in final reports due at the end of December 2009. Significant data quality issues (including inconsistent use of survey items and changes in respondent populations) affect the majority of grant sites in the cohort, resulting in no valid data for this cohort.

Authorized representatives for the grant site sign the annual performance report and, in doing so, certify that to the best of the signer's knowledge and belief, all data in the performance report are true and correct and that the report fully discloses all known weaknesses concerning the accuracy, reliability, and completeness of the data included. Generally, the Department relies on the certification concerning data supplied by grantees and does not conduct further reviews.

Data for the FY 2006 cohort are being collected as part of an evaluation of student drug testing. Data for the measures are being collected by the evaluation contractor, using common survey items and collection procedures. Survey responses are analyzed by the contractor and data are provided to the Department.

The anticipated levels of decrease in substance abuse are consistent with the national goals for the reduction of underage drug use included in the National Drug Control Strategy in effect when SDT grants were awarded – five percent per year. Targets were initially established following the report of baseline data for grant sites from the FY 2003 cohort. As discussed above, we do not currently have data of sufficient quality to support adjustment of targets for this program at this time.

Safe and Drug-Free Schools and Communities State Grants

Measure 6: The percentage of students in grades 9-12 who were offered, sold, or given an illegal drug on school property during the past 12 months. (Safe and Drug-Free Schools and Communities State Grants)

Table 6

FY 2005 Actual	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009 Target	FY 2009 Actual	FY 2010 Target
25.4	None	22.3	None	26	Pending	None

The measure. This measure is one of three measures directly related to reducing student drug or alcohol use for the Safe and Drug-Free Schools and Communities (SDFSC) State Grants. This formula grant program provides funds to the States, based on school-aged population and the State's relative share of Elementary and Secondary Education Act Title I concentration grant funds, to support drug and violence prevention programs. The measure directly relates to the National Drug Control Strategy Goal of preventing youth drug use by focusing on the extent to which illegal drugs are available on school property.

FY 2009 Performance Results. Data for this measure were collected in 2009, but will not be released by the Centers for Disease Control and Prevention until summer 2010.

FY 2010 Performance Targets. No target is established for this measure for FY 2010 because data is collected only every other year, in odd-numbered years. The target identified for this measure in FY 2009 was 26 percent. Although the FY 2007 results exceeded the established FY 2009 target, we did not go through the process to revise the 2009 target because the SDFSC State Grants program

was terminated in FY 2010. We will provide FY 2009 data in the FY 2010 performance summary report, but will end reporting for the measure at that time.

Methodology. Data for this measure are collected from a nationally representative sample of students in grades 9-12 as part of the Youth Risk Behavior Surveillance System (YRBSS), sponsored by the Centers for Disease Control and Prevention (CDC). Data are collected in odd years and reported in the following even years. No data are collected for even years and, as a result, no targets have been established for even years.

Detailed information about the methodology used to sample and report data for the YRBSS is available at the CDC website at: http://www.cdc.gov/mmwr/preview/mmwrhtml/ss5505a1.htm. We rely on the assertions provided about methodology presented by CDC in using this data to report on performance of SDFSC State Grants.

Measure 7: The percentage of students in grades 9-12 who used marijuana one or more times during the past 30 days. (SDFSC State Grants)

Table 7

FY 2005 Actual	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009 Target	FY 2009 Actual	FY 2010 Target
20.2	None	19.7	None	18	Pending	None

The measure. This measure is one of three measures directly related to reducing student drug and alcohol use for SDFSC State Grants. This formula grant program provides funds to the States, based on school-aged population and the State's relative share of Elementary and Secondary Education Act Title I concentration grant funds, to support drug and violence prevention programs. The measure is directly related to the National Drug Control Strategy Goal of preventing youth drug use by focusing on the extent of current use by high school aged-youth of the most prevalent illegal drug.

FY 2009 Performance Results. Data for this measure were collected in 2009, but will not be released by the Centers for Disease Control and Prevention until summer 2010.

FY 2010 Performance Targets. No target is established for this measure for FY 2010 because data is collected only every other year, in odd-numbered years. The target for this measure in FY 2009 is 18. Given the limited progress made toward achieving the established target level in FY 2007, we have not revised this target. Because the SDFSC State Grants was program was terminated in FY 2010, we will provide FY 2009 data in the FY 2010 performance summary report, but will end reporting for the measure at that time.

Methodology. Data for this measure are collected from a nationally representative sample of students in grades 9-12 as part of the Youth Risk Behavior Surveillance System (YRBSS), sponsored by the Centers for Disease Control and Prevention (CDC). Data are collected in odd years and reported in the following even years. No data are collected for even years and, as a result, no targets have been established for even years.

Detailed information about the methodology used to sample and report data for the YRBSS is available at the CDC website at: http://www.cdc.gov/mmwr/preview/mmwrhtml/ss5505a1.htm. We rely on the assertions provided about the methodology presented by CDC in using this data to report on performance of SDFSC State Grants.

Measure 8: The percentage of students in grades 9-12 who had five or more drinks of alcohol in a row one or more times during the past 30 days. (SDFSC State Grants)

Table 8

FY 2005 Actual	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009 Target	FY 2009 Actual	FY 2010 Target
25.5	None	26	None	25	Pending	None

The measure. This measure is one of three measures related to reducing student drug or alcohol use for SDFSC Grants. This formula grant program provides funds to the States, based on school-aged population and the State's relative share of Elementary and Secondary Education Act Title I concentration grant funds, to support drug and violence prevention programs. The measure is directly related to the National Drug Control Strategy Goal of preventing youth drug use by focusing on the prevalence of binge drinking by high school aged-students. While alcohol is not explicitly an emphasis of the National Drug Control Strategy, illegal use of alcohol can be associated with use of other illegal drugs.

FY 2009 Performance Results. Data for this measure were collected in 2009, but will not be released by the Centers for Disease Control and Prevention until summer 2010.

FY 2010 Performance Targets. No target is established for this measure for FY 2010 because data is collected only every other year, in odd-numbered years. The target for this measure for FY 2009 is 25. Given that there was no change in the data for this measure between 2005 and 2007, we did not revise the target for FY 2009. Because the SDFSC State Grants program was terminated in FY 2010, we will provide FY 2009 data in the FY 2010 performance summary report, but will end reporting for the measure at that time.

Methodology. Data for this measure are collected from a nationally representative sample of students in grades 9-12 as part of the Youth Risk Behavior Surveillance System (YRBSS), sponsored by the Centers for Disease Control and Prevention (CDC). Data are collected in odd years and reported in the following even years. No data are collected for even years and as a result no targets have been established for even years.

Detailed information about the methodology used to sample and report data for the YRBSS is available at the CDC website at: http://www.cdc.gov/mmwr/preview/mmwrhtml/ss5505a1.htm. We rely on the assertions provided about the methodology presented by CDC in using this data to report on performance of SDFSC State Grants.

Measure 9: The percentage of drug and violence prevention programs/practices supported with SDFSC State Grant funds that are research based. (SDFSC State Grants)

Table 9

FY 2005 Actual	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009 Target	FY 2009 Actual	FY 2010 Target
7.8	None	None	None	13	pending	None

The measure. This measure examines the extent to which programs and practices supported with SDFSC State Grant funds are based on research. The measure supports attainment of National Drug Control Strategy goals by focusing on the quality of programs supported with SDFSC State Grants funds and the likelihood that the programs will reduce or prevent youth drug use. The 2005 data constitute the baseline for this measure.

FY 2009 Performance Results. A contract to collect data to implement this measure could not be issued in time to permit data collection during FY 2008 as originally scheduled. As a result, we established a 2009 target against the 2005 baseline that is a linear extrapolation of a previously established FY 2008 target for this measure. Data collection for the measure began under the contract, but was cancelled based on the enacted appropriations statute for FY 2010 that did not provide funding for the State Grants program. No additional data will be available for this measure.

FY 2010 Performance Targets. Data for this measure were scheduled to be collected only every three years. As a result, no target was established for this measure for FY 2010. We do not intend to establish future targets given the termination of this program in FY 2010.

Methodology. Baseline data for this measure were collected from a nationally representative sample of schools under a contract supported by ED. As a first

step, the contractor developed a large list of research-based programs and then screened those programs to identify programs that were relevant to the SDFSC State Grants program; had at least two empirical studies completed that met stringent methodological standards; had implementation materials available; used at least two independent samples in program evaluations; and demonstrated an adequate level of program effectiveness.

The contractor collected data for the measure using surveys of national probability samples of public elementary and secondary schools and the school districts with which they were associated. The surveys – conducted using both mail and web-based approaches – gathered information on prevention programs operating during the 2004-2005 school year. Survey information was collected between fall 2005 and spring 2006.

The sample design included 2,500 districts, and nearly 6,000 schools that were sampled from the 2,500 districts. The contractor used the National Assessment of Educational Progress (NAEP) national sample frame. The NAEP sample frame is derived from the 2003-2004 National Center for Education Statistics Common Core of Data (CCD) Public Elementary and Secondary School Universe and Agency files. Using the NAEP sample frame allowed the contractor to take advantage of edits already made to the CCD files (for example eliminating administrative school districts from the sample frame).

Survey instruments used included 89 prevention programs; respondents were also able to write in any programs omitted from those listed. The contractor received responses from 91 percent of the districts included in the sample and 86 percent of schools.

The study conducted by the contractor to obtain data for this measure has some limitations that are the result of both the research synthesis and survey data collections. Despite significant efforts to be comprehensive, it is possible that the literature searches used may not have identified some published studies on prevention programs and, as a result, the number of research-based program may be understated.

Some other study limitations pertain to the quality of data collected via the surveys. Recall problems and responses from less knowledgeable respondents in some schools and districts (particularly among schools and districts that provided information late in the collection period) may have affected the quality of data. Schools may have also over-reported the prevention programs operating in their schools if respondents confused the specific named program in the survey with other similarly named but different programs.

Measure 10: The percentage of drug and violence prevention curriculum programs that are implemented with fidelity. (SDFSC State Grants)

Table 10

FY 2005 Actual	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009 Target	FY 2009 Actual	FY 2010 Target
44.3	None	None	None	53.1	pending	None

The measure. This measure examines the extent to which research-based curriculum programs supported with SDFSC State Grant funds are implemented with fidelity. The measure supports attainment of National Drug Control Strategy goals by focusing on the quality of implementation of the research-based programs and practices supported with SDFSC State Grants funds, and the corresponding likelihood that the programs will reduce or prevent youth drug use. The 2005 data constitute the baseline for this measure.

FY 2009 Performance Results. A contract to collect data to implement this measure could not be issued in time to permit data collection during FY 2008 as originally scheduled. As a result, we established a 2009 target against the 2005 baseline that is a linear extrapolation of a previously established FY 2008 target for this measure. Data collection for the measure began under the contract, but was cancelled based on the enacted appropriations statute for FY 2010 that did not provide funding for the State Grants program. No additional data will be available for this measure.

FY 2010 Performance Targets. Data for this measure were scheduled to be collected only every three years. As a result, no target was established for this measure for FY 2010. We do not intend to establish a target given the termination of this program in FY 2010.

Methodology. Baseline data for this measure were collected from a nationally representative sample of schools under a contract supported by ED. Data were collected in the fall of 2006, and reflected information about programs and practices implemented during the 2004-2005 school year. The contractor developed a list of research-based programs and compared information about programs and practices being implemented with SDFSC State Grants funds with the list of research-based program and practices. (See discussion for Measure 9)

The contractor then followed up with a subset of respondents to examine the extent to which research-based programs and practices were implemented in a manner consistent with implementation keys for individual programs (as determined by program developers). The contractor focused its review on the 10 programs (from the list of 21 research-based programs) that were implemented most frequently by respondents in the initial phase of the study.

The contractor mailed copies of questionnaires to principals and program implementers to each school that reported operating at least one research-based

program in the response to the earlier survey. The response rate for the questionnaire supplied to program implementers was 78 percent; the response rate for questionnaires completed by principals was 70 percent.

The study developed program-specific measures of quality implementation for each of the research-based programs identified by the study. The standards were based on program developer's specifications for individual programs. Aspects of implementation considered included issues such as frequency of student participation; number of lessons delivered; and topics covered. Based on applying these quality standards to data supplied on the two questionnaires, the contractor identified the percentage of research-based programs that were implemented according to the standards identified by the program developer (which the study refers to as being implemented with "fidelity").

This aspect of the study has some limitations related to the application of the program-specific standards used for assessing the quality of program implementation to responses provided from respondents concerning their program implementation. Valid measurement of quality of implementation required that a program developer's program specifications be applied to implementer reports on that specific program. In some cases, responses raised questions about whether respondents were reporting on the correct program. Study staff worked to confirm that implementers were reporting on the correct program; in cases where the implementer reported on the wrong program, that report was considered invalid and not included in the final data. If responses suggested that the program implementer reported on the wrong program and confirmation could not be made, those cases were also excluded from analyses.

Similar problems occurred for programs that had multiple components or different versions that are implemented for different ages or grade levels. Study staff reviewed program materials for different components or versions and worked to identify the program standards most closely related to the various components or versions. If a meaningful standard for a component or measure could be developed, the case was included in the analyses; if not, the program was omitted.

Limitations related to data quality from questionnaires also exist. Because a substantial number of cases were ineligible for inclusion in the study analyses for the reasons described above, the number of valid cases was reduced, leading in turn to decreased precision in estimates and larger than expected standard errors and confidence intervals. Similar recall problems caused by the gap between program implementation and data collection (as discussed for the previous measure) may have also impacted data quality. Finally, the quality of reports varied by the extent to which respondents were in a position to observe actual implementation and intentionally bias reports. Program implementers may have difficulty in providing objective information about programs they are

responsible for establishing. However, previous research using similar measures suggests that this "social desirability" bias is likely to be low.

Grants to Reduce Alcohol Abuse

Measure 11: The percentage of grantees whose target students show a measurable decrease in binge drinking. (Grants to Reduce Alcohol Abuse Program – FY 2005, 2007, and 2008 cohorts – no new grants were awarded under this program in FY 2006.)

Table 11

Cohort	FY 2005 Actual	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009 Target	FY 2009 Actual	FY 2010 Target
2005	n/a	n/a	65	pending	n/a	n/a	n/a
2007	n/a	n/a	n/a	61.5	76.87	47	49.4
2008	n/a	n/a	n/a	n/a	61.5	50.7	53.2

The measure. This measure examines a key outcome for the Grants to Reduce Alcohol Abuse (GRAA) program – reduction in binge drinking for the target population. While the National Drug Control Strategy is focused most intensively on preventing the use of controlled substances, the strategy does address the role of alcohol as a drug of choice for teenagers. Research suggests that early use of alcohol is more likely to result in heavy later use of alcohol.

FY 2009 Performance Results. Grantees from the FY 2005 cohort are currently operating in no-cost extensions; generally, their final reports are due at the end of 2009. Data will be aggregated and available in March 2010.

We used data from the 2008 reports from prior cohorts to establish the FY 2009 target for the FY 2007 cohort. However, it turned out that the FY 2007 cohort performed worse in 2009 than in 2008 and fell significantly short of the established performance target for 2009. The FY 2008 cohort also underperformed in its first year (2009) if compared to the year one results from the prior cohort. As we receive data from across cohorts for this measure, we are finding it difficult to discern a pattern of performance that can serve as a basis for establishing future targets.
It is difficult to assess why performance results for the 2007 and 2008 cohorts fell short of the established targets for this measure. We have carefully considered performance reports submitted by grantees, as well as our experience in monitoring and providing technical assistance to grantees, and have identified some challenges that may have impeded grant performance. Some common problems include turnover in leadership (at the authorized representative or project director level) and challenges with collecting and reporting valid data about the measure. Another variable that might affect performance in sites is

related to project design. For example, we're not certain how to assess the likely impact of a site that is implementing a single research-based program versus sites that have adopted a more comprehensive strategy that includes a community-based intervention that complements school-based curricula. Finally, cohort size and composition varies from cohort to cohort. In some years funding for a large amount of new awards is available and in others only a handful of sites will receive grants. To the extent that our peer review results that are used to rank order applications and select grantees accurately predict project quality, the range of scores funded (and perhaps the range of project quality) varies from fiscal year to fiscal year.

We believe that an equally important dimension in assessing performance against established targets for this measure is our ability to correctly predict targets for measures. Because there is limited available research and no "industry" standard available to guide expectations for performance, generally we have used the performance of prior cohorts on the measure to establish targets for subsequent cohorts. Because of the need to establish targets for future cohorts before a single cohort has completed project implementation and submitted final data, we have based targets on information provided over a fairly limited amount of time, often reflecting the results of less than a single cohort of complete performance information. Initial challenges with data quality also resulted in situations where only a limited number of grantees in a cohort were able to provide valid performance data. This situation introduced two possible problems into the target setting process – that targets are being based in some part on a subset of grantees that are not representative of the cohort as a whole, and that those sites able to provide valid data more quickly may also have superior capacity to effectively implement program interventions. While we have placed a significant emphasis on improving data quality and have worked to improve the response rates for measures over the life of the cohort, this causes performance results from a relatively small set of grantees in year one to be compared to results for a significantly larger percentage of the cohort by the end of project.

Increasingly, it is clear that a series of variables serve to make each cohort unique, and that the issue of how we have established targets for this measure has been problematic. Revised processes for establishing targets for this measure are discussed in the FY 2010 Performance Targets section below.

FY 2010 Performance Targets. We established an FY 2009 target for the FY 2007 cohort based on the performance of prior cohorts in 2009. This cohort achieved performance levels after one year that were close to those met after two years by a prior cohort, but experienced a significant decline in FY 2009. Based on lower than anticipated levels of performance for this measure, we revised the FY 2010 targets for both the FY 2007 and FY 2008 cohorts for this measure. The 2010 target for the FY 2007 cohort was reduced from 80 percent to 49.4 percent (or a target level that represents a 5 percent increase of the FY

2009 actual data for this measure)., The 2010 target for the FY 2008 cohort was reduced from 76.87 percent to 53.2 percent (or a target level that represents a 5 percent increase of the FY 2009 actual data for this measure).

Given these challenges, and improvements we have made in data quality (including generally requiring grantees to collect baseline data for their projects before interventions are implemented), we intend to modify our process for establishing targets. While prior cohort performance may provide some insights about general patterns of performance that we can incorporate into our targeting setting processes, for any future cohorts for this program we will establish numerical performance targets after baseline data is received for the new cohort. We will enter these targets into the Department's Visual Performance System (VPS) as "administrative" targets (for example, baseline plus 5 percent), and then convert the targets to numerical targets after baseline data is collected and aggregated. We believe that this process revision will help us better match targets to cohort performance.

Methodology. Data for this measure are collected by grantees and reported as part of annual performance reports. If data for this measure are not available at the time that performance reports are submitted, staff follow up with sites to attempt to obtain data for the measure. Grantees that fail to provide data are not included in the tabulation of data for the measures. Also, grantees that did not provide data for two consecutive project years (so that we could determine if a decrease in binge drinking had occurred) are not included in the aggregate data reported for the measure. Authorized representatives for the grant site sign the annual performance report and, in doing so, certify that to the best of the signer's knowledge and belief, all data in the performance report are true and correct and that the report fully discloses all known weaknesses concerning the accuracy, reliability, and completeness of the data included. Generally, the Department relies on the certification concerning data supplied by grantees and does not conduct further reviews.

ED does not mandate data collection protocols or instruments for grantees. Grantees select a survey item that reflects the concept of binge drinking, and collect and report data about that survey item as part of their performance reports. As a result, data are not comparable across grant sites, but individual grant sites are required to use the same survey items across performance periods. We consider sites that have experienced a decrease in the rate of binge drinking of one percent or greater to have achieved a measurable decrease in binge drinking.

Initially, applicants were not required to furnish baseline data as part of their applications. Data supplied after year one were considered baseline data for the projects. Projects required two years of data in order to determine if a decrease in binge drinking among target students has occurred.

We have provided significantly increased guidance and technical assistance to grantees beginning with the FY 2007 cohort, and believe that these efforts have produced data that are of higher quality and more comparable across sites than those of previous cohorts. These cohorts were instructed to provide baseline data in their application, or if that data was not available, to collect it before beginning project implementation.

Measure 12: The percentage of grantees that show a measurable increase in the percentage of target students who believe that alcohol abuse is harmful to their health. (Grants to Reduce Alcohol Abuse – FY 2005, 2007, and 2008 cohorts – no new grants were awarded under this program in FY 2006.)

Table 12

Cohort	FY 2005 Actual	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009 Target	FY 2009 Actual	FY 2010 Target
2005	n/a	n/a	70	pending	n/a	n/a	n/a
2007	n/a	n/a	n/a	69.2	86.5	76.5	80.3
2008	n/a	n/a	n/a	n/a	69.2	58.6	61.5

The measure. This measure examines a key outcome for the Grants to Reduce Alcohol Abuse (GRAA) program – perception of health risk for alcohol abuse among target students. While the National Drug Control Strategy is focused most intensively on preventing the use of controlled substances, the Strategy does address the role of alcohol use as a drug of choice for teenagers. Data do suggest that changes in perceptions about risks to health resulting from alcohol use are positively correlated with reductions in alcohol use.

FY 2009 Performance Results. Grantees from the FY 2005 cohort are currently operating in no-cost extensions; generally, their final reports are due at the end of 2009. Data will be aggregated and available in March 2010.

We used data from the 2008 reports to establish the FY 2009 target for the FY 2007 cohort. However, it turned out that the FY 2007 cohort performed worse in 2009 than in 2008 and fell short of the established performance target for 2009. The FY 2008 cohort also underperformed in its first year (2009) if compared to the year one results from the prior cohort. As we receive data from across cohorts for this measure, we are finding it difficult to discern a pattern of performance that can serve as a basis for establishing future targets.

It is difficult to assess why performance results for the 2007 and 2008 cohorts fell short of the established targets for this measure. We have carefully considered performance reports submitted by grantees, as well as our experience in monitoring and providing technical assistance to grantees, and have identified

some challenges that may have impeded grant performance. Some common problems include turnover in leadership (at the authorized representative or project director level) and challenges with collecting and reporting valid data about the measure. Another variable that might affect performance in sites is related to project design. For example, we're not certain how to assess the likely impact of a site that is implementing a single research-based program versus sites that have adopted a more comprehensive strategy that includes a community-based intervention that complements school-based curricula. Finally, cohort size and composition varies from cohort to cohort. In some years funding for a large amount of new awards is available and in others only a handful of sites will receive grants. To the extent that our peer review results that are used to rank order applications and select grantees accurately predict project quality, the range of scores funded (and perhaps the range of project quality) varies from fiscal year to fiscal year.

We believe that an equally important dimension in assessing performance against established targets for this measure is our ability to correctly predict targets for measures. Because there is limited available research and no "industry" standard available to guide expectations for performance, generally we have used the performance of prior cohorts on the measure to establish targets for subsequent cohorts. Because of the need to establish targets for future cohorts before a single cohort has completed project implementation and submitted final data, we have based targets on information provided over a fairly limited amount of time, often reflecting the results of less than a single cohort of complete performance information. Initial challenges with data quality also resulted in situations where only a limited number of grantees in a cohort were able to provide valid performance data. This situation introduced two possible problems into the target setting process – that targets are being based in some part on a subset of grantees that are not representative of the cohort as a whole, and that those sites able to provide valid data more quickly may also have superior capacity to effectively implement program interventions. While we have placed a significant emphasis on improving data quality and have worked to improve the response rates for measures over the life of the cohort, this causes performance results from a relatively small set of grantees in year one to be compared to results for a significantly larger percentage of the cohort by the end of project.

Increasingly, it is clear that a series of variables serve to make each cohort unique, and that the issue of how we have established targets for this measure has been problematic. Revised processes for establishing targets for this measure are discussed in the FY 2010 Performance Targets section below.

FY 2010 Performance Targets. We had established an FY 2009 target for the FY 2007 cohort based on the performance of prior cohorts in 2008. However, this cohort experienced a significant decline in performance in FY 2009. Based

on lower than anticipated levels of performance for this measure, we revised the FY 2010 targets for both the FY 2007 and FY 2008 cohorts for this measure. The 2010 target for the FY 2007 cohort was reduced from 86.5 percent to 80.3 percent (or a target level that represents a 5 percent increase of the FY 2009 actual data for this measure). The 2010 target for the FY 2008 cohort was reduced from 86.5 percent to 61.5 percent (or a target level that represents a 5 percent increase of the FY 2009 actual data for this measure)

Given these challenges, and improvements we have made in data quality (including generally requiring grantees to collect baseline data for their projects before interventions are implemented), we intend to modify our process for establishing targets. While prior cohort performance may provide some insights about general patterns of performance that we can incorporate into our targeting setting processes, for any future cohorts for this program we will establish numerical performance targets after baseline data is received for the new cohort. We will enter these targets into the Department's Visual Performance System (VPS) as "administrative" targets (for example, baseline plus 5 percent), and then convert the targets to numerical targets after baseline data is collected and aggregated. We believe that this process revision will help us better match targets to cohort performance.

Methodology. Data for this measure are collected by grantees and reported as part of annual performance reports. If data for this measure are not available at the time that performance reports are submitted, staff follow up with sites to attempt to obtain data for the measure. Grantees that fail to provide data are not included in the tabulation of data for the measures. Also, grantees that did not provide data for two consecutive project years (so that we could determine if an increase in the percentage of students who believe that alcohol abuse is harmful to their health had occurred) are not included in the aggregate data reported for the measure. Authorized representatives for the grant site sign the annual performance report and, in doing so, certify that to the best of the signer's knowledge and belief, all data in the performance report are true and correct and that the report fully discloses all known weaknesses concerning the accuracy, reliability, and completeness of the data included. Generally, the Department relies on the certification concerning data supplied by grantees and does not conduct further reviews.

ED does not mandate data collection protocols or instruments for grantees. Grantees select a survey item that reflects the concept of perceived harm to health, and collect and report data about that survey item as part of performance reports. As a result, data are not comparable across grant sites, but individual grant sites are required to use the same survey items across performance periods. We consider sites that have experienced an increase in the percentage of students reporting perceived risk of harm to health of one percent or greater to have achieved a measurable increase for this measure.

Initially, applicants were not required to furnish baseline data as part of their applications. Data supplied after year one were considered baseline data for the projects. Projects required two years of data in order to determine if a decrease in binge drinking among target students has occurred.

We have provided significantly increased guidance and technical assistance beginning with the FY 2007 cohort, and believe that these efforts have produced data that are of higher quality and more comparable across sites than those of previous cohorts. These cohorts were instructed to provide baseline data in their application, or if that data was not available, to collect it before beginning project implementation.

Measure 13: The percentage of grantees that show a measurable increase in the percentage of target students who disapprove of alcohol abuse. (Grants to Reduce Alcohol Abuse – FY 2005, 2007, and 2008 cohorts – no new grants were awarded under this program in FY 2006.)

Table 13

Cohort	FY 2005 Actual	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009 Target	FY 2009 Actual	FY 2010 Target
2005	n/a	n/a	71	pending	n/a	n/a	n/a
2007	n/a	n/a	n/a	69.2	86,5	47	49.4
2008	n/a	n/a	n/a	n/a	69.2	49.3	51.8

The measure. This measure examines a key outcome for the Grants to Reduce Alcohol Abuse (GRAA) program – perception of health risk for alcohol abuse among target students. While the National Drug Control Strategy is focused most intensively on the preventing the use of controlled substances, the Strategy does address the role of alcohol use as a drug of choice for teenagers. Data do suggest that increases in the percentage of target students who believe that alcohol abuse is not socially acceptable are associated with declines in consumption of alcohol.

FY 2009 Performance Results. Grantees from the FY 2005 cohort are currently operating in no-cost extensions; generally, their final reports are be due at the end of 2009. Data will be aggregated and available in March 2010.

We used data from the 2008 reports to establish the FY 2009 target for the FY 2007 cohort. However, it turned out that the FY 2007 cohort performed worse in 2009 than in 2008 and fell short of the established performance target for 2009. The FY 2008 cohort also significantly underperformed in its first year (2009) if compared to the year one results from the prior cohort. As we receive data from

across cohorts for this measure, we are finding it difficult to discern a pattern of performance that can serve as a basis for establishing future targets, and have elected not to revise the target for FY 2010.

It is difficult to assess why performance results for the 2007 and 2008 cohorts fell short of the established targets for this measure. We have carefully considered performance reports submitted by grantees, as well as our experience in monitoring and providing technical assistance to grantees, and have identified some challenges that may have impeded grant performance. Some common problems include turnover in leadership (at the authorized representative or project director level) and challenges with collecting and reporting valid data about the measure. Another variable that might affect performance in sites is related to project design. For example, we're not certain how to assess the likely impact of a site that is implementing a single research-based program versus sites that have adopted a more comprehensive strategy that includes a community-based intervention that complements school-based curricula. Finally, cohort size and composition varies from cohort to cohort. In some years funding for a large amount of new awards is available and in others only a handful of sites will receive grants. To the extent that our peer review results that are used to rank order applications and select grantees accurately predict project quality, the range of scores funded (and perhaps the range of project quality) varies from fiscal year to fiscal year.

We believe that an equally important dimension in assessing performance against established targets for this measure is our ability to correctly predict targets for measures. Because there is limited available research and no "industry" standard available to guide expectations for performance, generally we have used the performance of prior cohorts on the measure to establish targets for subsequent cohorts. Because of the need to establish targets for future cohorts before a single cohort has completed project implementation and submitted final data, we have based targets on information provided over a fairly limited amount of time, often reflecting the results of less than a single cohort of complete performance information. Initial challenges with data quality also resulted in situations where only a limited number of grantees in a cohort were able to provide valid performance data. This situation introduced two possible problems into the target setting process – that targets are being based in some part on a subset of grantees that are not representative of the cohort as a whole, and that those sites able to provide valid data more quickly may also have superior capacity to effectively implement program interventions. While we have placed a significant emphasis on improving data quality and have worked to improve the response rates for measures over the life of the cohort, this causes performance results from a relatively small set of grantees in year one to be compared to results for a significantly larger percentage of the cohort by the end of project.

Increasingly, it is clear that a series of variables serve to make each cohort unique, and that the issue of how we have established targets for this measure has been problematic. Revised processes for establishing targets for this measure are discussed in the FY 2010 Performance Targets section below.

FY 2010Performance Targets. We had established an FY 2009 target for the FY 2007 cohort based on the performance of prior cohorts in 2008. However, this cohort experienced a significant decline in performance in FY 2009. Based on lower than anticipated levels of performance for this measure, we revised the FY 2010 targets for both the FY 2007 and FY 2008 cohorts for this measure. The 2010 target for the FY 2007 cohort was reduced from 86.5 percent to 49.4 percent (or a target level that represents a 5 percent increase of the FY 2009 actual data for this measure), The 2010 target for the FY 2008 cohort was reduced from 86.5 percent to 51.8 percent (or a target level that represents a 5 percent increase of the FY 2009 actual data for this measure).

Given these challenges, and improvements we have made in data quality (including generally requiring grantees to collect baseline data for their projects before interventions are implemented), we intend to modify our process for establishing targets. While prior cohort performance may provide some insights about general patterns of performance that we can incorporate into our targeting setting processes, for any future cohorts for this program we will establish numerical performance targets after baseline data is received for the new cohort. We will enter these targets into the Department's Visual Performance System (VPS) as "administrative" targets (for example, baseline plus 5 percent), and then convert the targets to numerical targets after baseline data is collected and aggregated. We believe that this process revision will help us better match targets to cohort performance.

Methodology. Data for this measure are collected by grantees and reported as part of annual performance reports. If data for this measure are not available at the time that performance reports are submitted, staff follow up with sites to attempt to obtain data for the measure. Grantees that fail to provide data are not included in the tabulation of data for the measures. Also, grantees that did not provide data for two consecutive project years (so that we could determine if an increase in the percentage of students that disapprove of alcohol abuse had occurred) are not included in the aggregate data reported for the measure. Authorized representatives for the grant site sign the annual performance report, and in doing so, certify that to the best of the signer's knowledge and belief, all data in the performance report are true and correct and that the report fully discloses all known weaknesses concerning the accuracy, reliability, and completeness of the data included. Generally, the Department relies on the certification concerning data supplied by grantees and does not conduct further reviews.

ED does not mandate data collection protocols or instruments for grantees. Grantees select a survey item that reflects the concept of disapproval of alcohol abuse, and collect and report data about that survey item as part of performance reports. As a result, data are not comparable across grant sites, but individual grant sites are required to use the same survey items across performance periods. We consider sites that have experienced an increase in the percentage of students reporting disapproval of alcohol use of one percent or greater to have achieved a measurable increase for this measure.

Initially, applicants were not required to furnish baseline data as part of their applications. Data supplied after year one were considered baseline data for the projects. Projects required two years of data in order to determine if a decrease in binge drinking among target students has occurred.

We have provided significantly increased guidance and technical assistance beginning with the FY 2007 cohort, and believe that these efforts have produced data that are of higher quality and more comparable across sites than those of previous cohorts. These cohorts were instructed to provide baseline data in their application, or if that data was not available, to collect it before beginning project implementation.

Assertions

Performance Reporting System

The Department of Education has a system in place to capture performance information accurately and that system was properly applied to generate the performance data in this report. In instances in which data are supplied by grantees as part of required periodic performance reports, the data that are supplied are accurately reflected in this report.

Data related to the drug control programs included in this Performance Summary Report for Fiscal Year 2009 are recorded in the Department of Education's software for recording performance data and are an integral part of our budget and management processes.

Explanations for Not Meeting Performance Targets

The explanations provided in the Performance Summary report for Fiscal Year 2009 for not meeting performance targets and for recommendations for plans to revise performance targets are reasonable given past experience, available information, and available resources.

Methodology for Establishing Performance Targets

The methodology described in the Performance Summary Report for Fiscal Year 2009 to establish performance targets for the current year is reasonable given past performance and available resources.

Performance Measures for Significant Drug Control Activities

The Department of Education has established at least one acceptable performance measure for each Drug Control Decision Unit identified in its Detailed Accounting of Fiscal Year 2009 Drug Control Funds.

Criteria for Assertions

Data

No workload or participant data support the assertions provided in this report. Sources of quantitative data used in the report are well documented. These data are the most recently available and are identified by the year in which the data was collected.

Other Estimation Methods

No estimation methods other than professional judgment were used to make the required assertions. When professional judgment was used, the objectivity and strength of those judgments were explained and documented. Professional judgment was used to establish targets for programs until data from at least one grant cohort were available to provide additional information needed to set more accurate targets. We routinely re-evaluate targets set using professional judgment as additional information about actual performance on measures becomes available.

Reporting Systems

Reporting systems that support the above assertions are current, reliable, and an integral part of the Department of Education's budget and management processes. Data collected and reported for the measures discussed in this report are stored in the Department of Education's Visual Performance System (VPS). The VPS includes appropriate disclosures about data quality issues associated with measures. Data from the VPS are used in developing annual budget requests and justifications, and in preparing reports required under the Government Performance and Results Act of 1993.

UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF INSPECTOR GENERAL

AUDIT SERVICES

February 25, 2010

MEMORANDUM

To: Kevin Jennings
Assistant Deputy Secretary
Office of Safe and Drug-Free Schools

From: Keith West
Assistant Inspector General for Audit

Subject: Office of Inspector General's Independent Report on the U.S. Department of Education's *Performance Summary Report for Fiscal Year 2009*, dated February 19, 2010

Attached is our authentication of management's assertions contained in the U.S. Department of Education's *Performance Summary Report for Fiscal Year 2009*, dated February 19, 2010, as required by section 705(d) of the Office of National Drug Control Policy Reauthorization Act of 1998 (21 U.S.C. § 1704(d)).

Our authentication was conducted in accordance with the guidelines stated in the Office of National Drug Control Policy Circular: *Drug Control Accounting*, dated May 1, 2007.

If you have any questions or wish to discuss the contents of this authentication, please contact Michele Weaver-Dugan, Director, Operations Internal Audit Team, at (202) 245-6941.

Attachment

UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF INSPECTOR GENERAL

AUDIT SERVICES

February 25, 2010

Office of Inspector General's Independent Report on the U.S. Department of Education's *Performance Summary Report for Fiscal Year 2009*, dated February 19, 2010

We have reviewed management's assertions contained in the accompanying *Performance Summary Report for Fiscal Year 2009*, dated February 19, 2010 (Performance Summary Report). The U.S. Department of Education's management is responsible for the Performance Summary Report and the assertions contained therein.

Our review was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. A review is substantially less in scope than an examination, the objective of which is the expression of an opinion on management's assertions. Accordingly, we do not express such an opinion.

We performed review procedures on the "Performance Summary Information," "Assertions," and "Criteria for Assertions" contained in the accompanying Performance Summary Report. In general, our review procedures were limited to inquiries and analytical procedures appropriate for our review engagement. We did not perform procedures related to controls over the reporting system noted in the attached report.

Based on our review, nothing came to our attention that caused us to believe that management's assertions, contained in the accompanying Performance Summary Report, are not fairly stated in all material respects, based upon the Office of National Drug Control Policy Circular: *Drug Control Accounting*, dated May 1, 2007.

Keith West
Assistant Inspector General for Audit