February 14, 2012

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 2011, 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,

[Signature]

David Esquith
Acting Director, Office of Safe and Healthy Students

Enclosure #1: Department of Education Performance Summary Report for Fiscal Year 2011, February 8, 2012

Enclosure #2: Authentication letter from Patrick J. Howard, Assistant Inspector General for Audit Services, February 14, 2012

cc: Patrick J. Howard
Department of Education

Performance Summary Report
Fiscal Year 2011

In Support of the
National Drug Control Strategy
As required by ONDCP Circular: Drug Control Accounting

February 8, 2012
# Performance Summary Report for Fiscal Year 2011

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February 8, 2012

Kathleen S. Tighe
Inspector General
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, DC 20202-1510

Dear Ms. Tighe:

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 Drug Control Budget Decision Unit under which the 2011 budgetary resources for the Department of Education are displayed in the Fiscal Year 2012 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. ONDCP requests these documents by February 15, 2012. Please do not hesitate to contact me if you have any questions about the enclosed information.

Sincerely,

[Signature]

David Esquith
Acting Director, Office of Safe and Healthy Students
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

<table>
<thead>
<tr>
<th>Cohort</th>
<th>FY2007 Actual</th>
<th>FY2007 Actual</th>
<th>FY2009 Actual</th>
<th>FY2009 Actual</th>
<th>FY2011 Target</th>
<th>FY2011 Target</th>
<th>FY2012 Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>2005</td>
<td>43.8</td>
<td>34.2</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>2006</td>
<td>66.7</td>
<td>66.7</td>
<td>66.7</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
</tbody>
</table>

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 FY 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 2011 Performance Results. FY 2011 targets were not set as grantees were no longer active. However, in the FY 2010 performance report we noted that we were then discussing options for compiling FY 2009 actual performance results for the FY 2005 cohort, as well as FY 2010 actual performance results for the 2006 cohort.

FY 2009 data for the 2005 SS/HS cohort was included in their final performance report. The 2006 cohort of grantees received no-cost extensions during FY 2009. Final GPRA data for this cohort was generally submitted at the end of December 2010 and final reports were being reviewed in spring 2011 related to grantee performance in FY 2010.
The SS/HS National Evaluation contractor (supported by HHS/SAMHSA) performed the review and cleaning of GPRA performance data received by these cohorts of SS/HS grantees. The contract was not specific about reviewing and cleaning data received in final reports.

The national evaluation team received the data after both of the 2005 and 2006 grant cohorts had closed and completed grant activity, and thus, were not able to confer with project directors and correct performance data as needed in order for it to be comparable with prior performance data. Thus, no performance data are able to be reported for the final year of activity.

**FY 2012 Performance Targets.**
Both the FY 2005 and 2006 grant cohorts were not operating in FY 2011. Thus, no targets were set for FY 2011, nor for FY 2012.

**Methodology.** Data for these grant cohorts 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 used data for this measure as part of the program evaluation. The evaluation contractor reviewed data submitted, and worked with grantees to seek clarifying information and provide technical assistance if grantees were having difficulty in collecting or reporting data for this measure.

Grantees that failed to provide data were 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) were not included in data reported for the measure. Authorized representatives for the grant site signed the annual performance report and, in doing so, certified that to the best of the signer's knowledge and belief, all data in the performance report were true and correct and that the report fully disclosed all known weaknesses concerning the accuracy, reliability, and completeness of the data included. Generally, the Department relied on the certification concerning data supplied by grantees and did not conduct further reviews.
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, 2008, and 2009 cohorts)

Table 2

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>2007</td>
<td>n/a</td>
<td>53.8</td>
<td>42.9</td>
<td>37.5</td>
<td>59.9</td>
<td>51.9</td>
<td>n/a</td>
</tr>
<tr>
<td>2008</td>
<td>n/a</td>
<td>n/a</td>
<td>50.0</td>
<td>43.6</td>
<td>52.5</td>
<td>58.3</td>
<td>61.8</td>
</tr>
<tr>
<td>2009</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>0</td>
<td>50.0</td>
<td>55.2</td>
<td>56.9</td>
</tr>
</tbody>
</table>

The measure. This performance measure is for the Safe Schools/Healthy Students initiative, a joint project of the Departments of Education (ED), Health and Human Services (HHS), 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 was 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 2011 Performance Results. Beginning with the FY 2007 cohort, grantees are required to provide baseline data prior to implementing interventions. Generally, after the first project year grantees reported baseline data and year one actual performance data. Across all cohorts (2007, 2008, and 2009) some sites experienced significant delays in beginning implementation of interventions. Reasons for delays include the need to finalize partnership agreements, complete a project logic model, develop an evaluation plan, and for some, to collect baseline data.

For the FY 2007 and FY 2008 cohorts, actual performance data for FY 2010 were being reviewed and aggregated when the FY 2010 performance report was due, and thus are now being reported on for the first time.

The FY 2009 cohort, at the time of the writing of the FY 2010 report, had recently submitted baseline and year one actual performance data. Actual data for FY 2010 were being reviewed and aggregated when the FY 2010 performance report was due, and thus are now being reported on for the first time. None of the grantees, for which comparable data was available, reported a decrease on the measure. As this was the first year of data reporting, this was due in part to a lower percentage of grantees reporting comparable data, than is normally the case in subsequent reporting cycles.
For all three cohorts, FY 2011 actual performance data have been aggregated, and are reported in Table 2. Both the 2008 and 2009 cohorts exceeded their FY 2011 targets. However, the 2007 cohort failed to meet the 2011 target set, although grantees made substantial progress on the measure compared to FY 2010 actual performance. This was due, in part, to the target being set based on FY 2008 actual performance data, and before the FY 2009 and FY 2010 actual performance had been reported.

The Department’s Office of Safe and Drug-Free Schools (now the Office of Safe and Healthy Students) made a meaningful improvement to the technical assistance (TA) process in FY 2011 by developing a technical assistance rating tool that grant monitors are completing. This tool assists monitors in identifying shortfalls in project delivery by grantees so that the grant monitor can more easily identify problem areas. The office provided training on this technical assistance rating tool to all grant monitors by April 2011, so they are now able to provide improved and more up-to-date technical assistance to grantees.

Moreover, as part of a continuous improvement effort for the Safe Schools/Healthy Students initiative, a leadership team was formed that was made up of the team leads from ED and HHS as well as the leads for the 3 TA contractors to develop a new and more systematic approach to identifying grantee technical assistance needs. Additionally, the primary technical assistance contractor for the initiative convenes a “grantee council” made up of project directors for funded grants to help advise and assess technical assistance provision. The Safe Schools/Healthy Students initiative has also increased its use of GPRA as well as other performance measures reported by the grantees to plan individual technical assistance as well as cohort-wide and face-to-face training events.

FY 2012 Performance Targets. The setting of FY 2012 performance targets was based on an analysis of prior-year performance of multiple cohorts. The FY 2007 cohort data (from FY 2008 and 2009) shows that the cohort’s initial project year (FY 2008) performance results were better than second project year (FY 2009) performance results. Staff analysis of grantee data resulted in the identification of numerous factors thought to contribute to the decline in performance results in the second year of the project that informed the setting of subsequent targets.

Based on this analysis, and considering the changes made to the GPRA measures, targets were set using an incremental increase annually of baseline plus 2, 3, and 6, percent for the FY 2007, 2008, and 2009 cohorts. Additionally, a cap of 85 percent was set as the maximum target for the measure given ceiling effects.

At the time of the writing of the FY 2010 performance report, for the FY 2009 cohort, we were awaiting the final aggregation of first year performance data in
order to set a FY 2010 baseline against which to apply the plus 2 and 3 percent, respectively, by which the FY 2011 and FY 2012 targets would be calculated. However, given that none of the FY 2009 grantees achieved the performance benchmarks, we deviated from using our formula, and instead set a target for FY 2011 based on past cohort performance.

Revisions have also been made to certain FY 2012 targets where FY 2011 actual performance exceeded targets previously set.

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 and from these cohorts 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.

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, 2008, and 2009 cohorts)

Table 3

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>2007</td>
<td>n/a</td>
<td>71.4</td>
<td>47.8</td>
<td>66.7</td>
<td>79.5</td>
<td>70.4</td>
<td>n/a</td>
</tr>
<tr>
<td>2008</td>
<td>n/a</td>
<td>n/a</td>
<td>56.0</td>
<td>60.0</td>
<td>61.8</td>
<td>75.0</td>
<td>79.5</td>
</tr>
<tr>
<td>2009</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>0</td>
<td>50.0</td>
<td>58.6</td>
<td>60.4</td>
</tr>
</tbody>
</table>
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 substance 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 2011 Performance Results. Beginning with the FY 2007 cohort, grantees are required to provide baseline data prior to implementing interventions. Generally, after the first project year grantees reported baseline data and year 1 actual performance data. Across all cohorts (2007, 2008, and 2009) some sites experienced significant delays in beginning implementation of interventions. Reasons for delays include the need to finalize partnership agreements, complete a project logic model, develop an evaluation plan, and for some, to collect baseline data. Delays in implementing interventions significantly impacted the number of grantees with comparable data to contribute to performance results.

For the FY 2007 and 2008 cohorts, actual data for FY 2010 were being reviewed and aggregated when the FY 2010 performance report was due, and thus are now being reported on for the first time.

The FY 2009 cohort, at the time of the writing of the FY 2010 report had recently submitted baseline and year 1 actual [performance] data. Actual data for FY 2010 were being reviewed and aggregated when the FY 2010 performance report was due, and thus are now being reported on for the first time. None of the grantees, for which comparable data was available, reported a decrease on the measure. As this was the first year of data reporting, this was due in part to a lower percentage of grantees reporting comparable data, than is normally the case in subsequent reporting cycles.

For all three cohorts, FY 2011 actual performance data have been aggregated, and are reported in Table 3. Both the FY 2008 and 2009 cohorts exceeded their FY 11 targets. However, the FY 2007 cohort failed to meet the FY 2011 target set, although grantees made substantial progress on the measure compared to FY 2010 actual performance. This was due, in part, to the target being set based
on FY 2008 actual performance data, and before the FY 2009 and FY 2010 actual performance had been reported.

The Department's Office of Safe and Drug-Free Schools (now the Office of Safe and Healthy Students) made a meaningful improvement to the technical assistance (TA) process in FY 2011 by developing a technical assistance rating tool that grant monitors are completing. This tool assists monitors identify shortfalls in project delivery by the grantees so that the grant monitor can more easily identify problem areas. The office provided training on this technical assistance rating tool to all grant monitors by April 2011, so they are now able to provide improved and more up-to-date technical assistance to grantees.

Moreover, as part of a continuous improvement effort for the Safe Schools/Healthy Students initiative, a leadership team was formed that was made up of the team leads from ED and HHS as well as the leads for the 3 TA contractors to develop a new and more systematic approach to identifying grantee technical assistance needs. Additionally the primary technical assistance contractor for the initiative convenes a "grantee council" made up of project directors for funded grants to help advise and assess technical assistance provision. The Safe Schools/Healthy Students initiative has also increased its use of GPRA as well as other performance measures reported by the grantees to plan individual technical assistance as well as cohort-wide and face-to-face training events.

FY 2012 Performance Targets. The setting of FY 2011 performance targets was based on an analysis of prior-year performance of multiple cohorts. The FY 2007 cohort data (from FY 2008 and 2009) shows that the cohort's initial project year (FY 2008) performance results were better than second project year (FY 2009) performance results. Staff analysis of grantee data resulted in the identification of numerous factors thought to contribute to the decline in performance results in the second year of the project that informed the setting of subsequent targets.

Based on this analysis, and considering the changes made to the GPRA measures, targets were set using an incremental increase annually of baseline plus 2, 3, and 6, percent for the FY 2007, 2008, and 2009 cohorts. Additionally, a cap of 85 percent was set as the maximum target for the measure given ceiling effects.

At the time of the writing of the FY 2010 performance report, for the FY 2009 cohort, we were awaiting the final aggregation of first year performance data in order to set a FY 2010 baseline against which to apply the plus 2 and 3 percent, respectively, by which the FY 2011 and FY 2012 targets would be calculated. However, given that none of grantees achieved the performance benchmarks, we deviated from using our formula, and instead set a target for FY 2011 based on past cohort performance.
Revisions have also been made to certain FY 2012 targets where FY 2011 actual performance exceeded targets previously set.

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 and for these cohorts 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.

Student Drug Testing

Measure 1: 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 2006, 2007, and 2008 cohorts)

Table 4

<table>
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<tr>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>2006</td>
<td>n/a</td>
<td>66.7</td>
<td>12.5</td>
<td>57.0</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>2007</td>
<td>n/a</td>
<td>33.0</td>
<td>41.7</td>
<td>50.0</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>2008</td>
<td>n/a</td>
<td>n/a</td>
<td>49.0</td>
<td>65.0</td>
<td>70.0</td>
<td>Pending</td>
<td>n/a</td>
</tr>
</tbody>
</table>

The measure. This measure is one of two measures for the Student Drug Testing Program grant competition. The competition provided 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 between 2003 to 2009 in different versions of the strategy as a recommended drug prevention intervention.

FY 2008 was the last cohort of new grants made under the program and, as the grants were for a three project period, the FY 2008 cohort's last year of continuation funding was made in FY 2010.

FY 2011 Performance Results. FY 2011 performance data for the FY 2008 cohort are not included in table 4 above as a significant number of projects are still under no-cost extensions and we are awaiting more complete cohort data. It is anticipated that final data will be available in summer 2012.

The grantees in the FY 2007 cohort completed their grant activity in FY 2010, and thus performance data for FY 2011 are not applicable.

FY 2012 Performance Targets. No FY 2012 targets are applicable. FY 2011 was the last year of performance reporting of any of the Student Drug Testing grantees.

Methodology. Data for the FY 2006 cohort came from the evaluation conducted by a Department of Education contractor and were collected annually. Data for subsequent cohorts were collected by grantees using student surveys, and provided as part of the grantees' annual performance reports. Generally, grantees prior to FY 2008 cohort did 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. Beginning with the FY 2008 cohort, we asked grantees to provide data for current (prior 30-day) use of marijuana, as a proxy for illegal drug use. Beginning with the FY 2008 cohort, we also instructed grantees to collect baseline data for this measure before beginning with implementation of their student drug testing program.

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.
**Measure 2:** 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 2006, 2007, and 2008 cohorts)

**Table 5**

<table>
<thead>
<tr>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>2006</td>
<td>n/a</td>
<td>55.5</td>
<td>12.5</td>
<td>57.0</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>2007</td>
<td>n/a</td>
<td>33.0</td>
<td>33.3</td>
<td>54.0</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>2008</td>
<td>n/a</td>
<td>n/a</td>
<td>58.0</td>
<td>58.0</td>
<td>65.0</td>
<td>Pending</td>
<td>n/a</td>
</tr>
</tbody>
</table>

The measure. This measure is one of two measures for the Student Drug Testing Programs grant competition. The competition provided 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 2008 was the last cohort of new grants made under the program and, as the grants were for a three project period, the FY 2008 cohort’s last year of continuation funding was made in FY 2010.

**FY 2011 Performance Results.** FY 2011 performance data for the FY 2008 cohort are not included in table 5 above as a significant number of projects are still under no-cost extensions and we are awaiting more complete cohort data. It is anticipated that final data will be available in summer 2012.

The grantees in the FY 2007 completed their grant activity in FY 2010, and thus performance reporting for FY 2011 is not applicable.

**FY 2012 Performance Targets.** No FY 2012 targets are applicable. FY 2011 was the last year of performance reporting of any of the Student Drug Testing grantees.

**Methodology.** Data for the FY 2006 cohort came from the evaluation conducted by a Department of Education contractor and were collected annually. Data for subsequent cohorts were collected by grantees using student surveys, and provided as part of the grantees’ annual performance reports. Generally, grantees prior to FY 2008 cohort did 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. Beginning with the FY 2008 cohort, we asked grantees to provide data for current (prior 30-day) use of marijuana, as a proxy for illegal drug use. Beginning with the FY 2008 cohort, we also instructed grantees to collect baseline data for this measure before beginning with implementation of their student drug testing program.

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.

**Safe and Supportive Schools**

In FY 2010 the Department awarded the first round of awards under the Safe and Supportive Schools program. Awards were made to State educational agencies (SEAs) to support statewide measurement of, and targeted programmatic interventions to improve, conditions for learning in order to help schools improve safety and reduce substance use. Projects must take a systematic approach to improving conditions for learning in eligible schools through improved measurement systems that assess conditions for learning, which must include school safety, and the implementation of programmatic interventions that address problems identified by data.

**FY 2011 Performance Results.** There is no performance data available for FY 2011. Baseline data will be available in FY 2013 on performance measures for the FY 2010 cohort.

**FY 2012 Performance Targets.** No targets are set for FY 2012 as baseline data will be available after 2012 on performance measures for the FY 2010 cohort.

**Measures.** ED has established several GPRA performance measures for assessing the effectiveness of Safe and Supportive Schools grants. The measures related to addressing the goals of the National Drug Control Strategy include:

(a) Percentage of eligible schools implementing programmatic interventions funded by Safe and Supportive Schools that experience a decrease in the percentage of students who report current (30-day) alcohol use;

(b) Percentage of eligible schools implementing programmatic interventions funded by Safe and Supportive Schools that experience an increase in the percentage of students who report current (30-day) alcohol use;

(c) Percentage of eligible schools implementing programmatic interventions funded by Safe and Supportive Schools that experience an improvement in their school safety score;
(d) Percentage of eligible schools implementing programmatic interventions funded by Safe and Supportive Schools that experience a worsening in their school safety score.

The school safety score is an index of school safety that may include the presence and use of illegal drugs (including alcohol and marijuana).

Methodology. These measures constitute the Department's indicators of success for the Safe and Supportive Schools grant program. Consequently, we advised applicants for a grant under this program to give careful consideration to these measures in conceptualizing the approach and evaluation for its proposed program. Each grantee will be required to provide, in its annual performance and final reports, data about its progress in meeting these measures.

Grants to Reduce Alcohol Abuse


Table 6

<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>2005</td>
<td>65.0</td>
<td>59.3</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>2007</td>
<td>n/a</td>
<td>61.5</td>
<td>47.0</td>
<td>83.0</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>2008</td>
<td>n/a</td>
<td>n/a</td>
<td>50.7</td>
<td>64.0</td>
<td>70.0</td>
<td>Pending</td>
<td>n/a</td>
</tr>
<tr>
<td>2009</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>57.1</td>
<td>65.0</td>
<td>67.0</td>
<td>77.0</td>
</tr>
<tr>
<td>2010</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>Set base</td>
<td>Pending</td>
<td>Pending</td>
</tr>
</tbody>
</table>

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. New awards were last made in FY 2010. Funds were not appropriated in FY 2012 for new or continuation awards.

FY 2011 Performance Results. The FY 2007 cohort completed its activities in 2011 and therefore no actual data are available nor were targets set for FY 2011. Data for the 2008 cohort have not yet been aggregated due to the large number of grantees in no-cost extensions. Aggregation of these data is expected by June 2012. The FY 2009 cohort, the only cohort for which FY 2011 data are...
currently available, met and slightly exceeded the target set. Final aggregation of FY 2011 data for the FY 2010 cohort is currently underway.

As we have received data from across cohorts for this measure and for this program, we continue to find it difficult to discern a pattern of performance that can serve as a basis for establishing future targets. 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 are uncertain 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.

Increasingly, it has become 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 in the past has been problematic. For example, we had established a 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 FY 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 FY 2010 target for the FY 2008 cohort was reduced from 76.9 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 have modified 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 generally 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.

In the case of FY 2011 targets for the 2008 and 2009 cohorts, these were set based on FY 2010 actual performance data.

**FY 2012 Performance Targets.** Targets have been set for the FY 2009 cohort. Final aggregation of FY 2011 data for the FY 2010 cohort is currently underway. Upon completion, the FY 2012 target can be set for the FY 2010 cohort.

**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 had occurred. However, the FY 2007 and subsequent cohorts were instructed to provide baseline data in their application, or if that data was not available, to collect it before beginning project implementation. Thus, we are able to report on grantee and cohort performance at the end of year one, as is done for the FY 2009 cohort in this report.

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.

Measure 2: 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, 2008, 2009, and 2010 cohorts)

Table 7

<table>
<thead>
<tr>
<th>Cohort</th>
<th>FY 2007 Actual</th>
<th>FY 2008 Actual</th>
<th>FY 2009 Actual</th>
<th>FY 2010 Target</th>
<th>FY 2011 Actual</th>
<th>FY 2011 Target</th>
<th>FY 2012 Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>2005</td>
<td>70.0</td>
<td>59.3</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>2007</td>
<td>n/a</td>
<td>69.2</td>
<td>76.5</td>
<td>88.9</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>2008</td>
<td>n/a</td>
<td>n/a</td>
<td>58.6</td>
<td>60.0</td>
<td>65.0</td>
<td>Pending</td>
<td>n/a</td>
</tr>
<tr>
<td>2009</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>100.0</td>
<td>100.0</td>
<td>67.0</td>
<td>100.0</td>
</tr>
<tr>
<td>2010</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>Set Base</td>
<td>Pending</td>
<td>Pending</td>
</tr>
</tbody>
</table>

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. New awards were last made in FY 2010. Funds were not appropriated in FY 2012 for new or continuation awards.

FY 2011 Performance Results. The 2007 cohort had completed its activities in 2011 and therefore no actual data are available nor were targets set for FY 2011. Data for the FY 2008 cohort have not been aggregated due to the large number of grantees in no-cost extensions. Aggregation for these data is expected by June 2012. The 2009 cohort, the only cohort for which 2011 data are currently available, did not meet its target. We are uncertain why this is the case but it may have been that the perfect gains across grantees in their first year were difficult to sustain for a second year.

Final aggregation of FY 2011 data for the FY 2010 cohort is currently underway. As we have received data from across cohorts for this measure and for this program, we continue to find it difficult to discern a pattern of performance that can serve as a basis for establishing future targets. 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 are uncertain 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.

Increasingly, it has become 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 in the past has been problematic. For example, 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 have modified 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 generally 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.

In the case of FY 2011 targets for the FY 2008 and 2009 cohorts, these were set based on FY 2010 actual performance data.
FY 2012 Performance Targets. Targets have been set for the FY 2009 cohort. Final aggregation of FY 2011 data for the FY 2010 cohort is currently underway. Upon completion, the FY 2012 target can be set for the FY 2010 cohort.

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 signee'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 perceptions of harm, 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 an increase in the percentage of students who believe alcohol abuse is harmful of one percent or greater to have achieved a measurable increase for the 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 had occurred. However, the FY 2007 and subsequent cohorts were instructed to provide baseline data in their application, or if that data was not available, to collect it before beginning project implementation. Thus, we are able to report on grantee and cohort performance at the end of year one, as is done for the FY 2009 cohort in this report.

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.

Measure 3: 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, 2008, 2009, and 2010 cohorts)
The measure. This measure examines a key outcome for the Grants to Reduce Alcohol Abuse (GRAA) program – disapproval of 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. Research does 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. New awards were last made in FY 2010. Funds were not appropriated in FY 2012 for new or continuation awards.

FY 2011 Performance Results. The FY 2007 cohort completed its activities in 2011 and therefore no actual data are available nor were targets set for FY 2011. Data for the 2008 cohort have not yet been aggregated due to the large number of grantees in no-cost extensions. Aggregation of these data is expected by June 2012. The FY 2009 cohort, the only cohort for which 2011 data are currently available, did not meet its target. We are uncertain why this is the case but it may have been that the perfect gains across grantees in their first year were difficult to sustain for a second year.

Final aggregation of FY 2011 data for the FY 2010 cohort is currently underway. As we have received data from across cohorts for this measure and for this program, we continue to find it difficult to discern a pattern of performance that can serve as a basis for establishing future targets. 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 are uncertain 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.

Increasingly, it has become 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 in the past has been problematic. For example, 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 FY 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 have modified 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 generally 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.

In the case of FY 2011 targets for the FY 2008 and 2009 cohorts, these were set based on FY 2010 actual performance data.

**FY 2012 Performance Targets.** Targets have been set for the FY 2009 cohort. Final aggregation of FY 2011 data for the FY 2010 cohort is currently underway. Upon completion, the FY 2012 target can be set for the FY 2010 cohort.

**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 disapproval of alcohol abuse, 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 an increase in the percentage of students who disapprove of alcohol abuse of one percent or greater to have achieved a measurable increase for the 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 had occurred. However, the FY 2007 and subsequent cohorts were instructed to provide baseline data in their application, or if that data was not available, to collect it before beginning project implementation. Thus, we are able to report on grantee and cohort performance at the end of year one, as is done for the FY 2009 cohort in this report.

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.

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 2011 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 2011 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 2011 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 2011 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).
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.
Memorandum

To: David Esquith
   Acting Director, Office of Safe and Healthy Students
   Office of Elementary and Secondary Education

From: Patrick J. Howard
   Assistant Inspector General for Audit


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

The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.
Performance Summary Report for Fiscal Year 2011, dated February 8, 2012

We have reviewed management’s assertions contained in the accompanying Performance
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.

Patrick J. Howard
Assistant Inspector General for Audit