Performance Summary Report

Fiscal Year 2020

In Support of the

National Drug Control Strategy

February 17, 2021
# U.S. Department of Education

Performance Summary Report for Fiscal Year 2020

## TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transmittal Letter</td>
<td>1</td>
</tr>
<tr>
<td>Performance Summary Information</td>
<td>2</td>
</tr>
<tr>
<td>School Climate Transformation LEA Grants (FY 2014 Cohort)</td>
<td>2</td>
</tr>
<tr>
<td>School Climate Transformation LEA Grants (FY 2019 Cohort)</td>
<td>8</td>
</tr>
<tr>
<td>Assertions</td>
<td>12</td>
</tr>
<tr>
<td>Criteria for Assertions</td>
<td>13</td>
</tr>
</tbody>
</table>
February 17, 2021

Ms. Sandra D. Bruce  
Acting Inspector General  
U.S. Department of Education  
400 Maryland Avenue, S.W.  
Washington, DC  20202-1510

Dear Ms. Bruce:

As required by ONDCP Circular National Drug Control Program Agency Compliance Reviews, enclosed please find detailed information about performance-related measures for a key drug control program administered by the U.S. Department of Education, in accordance with the guidelines in the circular dated October 22, 2019. This information covers the School Safety National Activities program, which is the Drug Control Budget Decision Unit under which budgetary resources for the Department of Education (ED) are included in the National Drug Control Budget.

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

Sincerely,

Paul Kesner  
Director  
Office of Safe and Supportive Schools
In FY 2014, the Department made the first round of awards under the School Climate Transformation Grant – Local Educational Agency (LEA) program to 71 school districts in 23 states, Washington, D.C., and the U.S. Virgin Islands. The funds are being used to develop, enhance, and expand systems of support for implementing evidence-based, multi-tiered behavioral frameworks for improving behavioral outcomes and learning conditions for students. The goals of the program are to connect children, youths, and families to appropriate services and supports; improve conditions for learning and behavioral outcomes for school-aged youths; and increase awareness of and the ability to respond to mental-health issues among school-aged youths.

School districts used these funds to implement models for reform and evidence-based practices that address the school-to-prison pipeline—the unfortunate and often unintentional policies and practices that push our nation’s schoolchildren, especially those who are most at-risk, out of classrooms and into the juvenile and criminal justice systems. The grants provided funding for up to five years, for a total of nearly $180 million. The final year of a five-year funding cycle was made to these grantees in FY 2018.

Drug prevention was an allowable activity. Indeed, grantees were encouraged, as part of their local needs-assessment, to measure student drug use along with other relevant issues and problems. The local needs-assessment was also used by grantees to help identify and select the most appropriate evidence-based practices. If the needs-assessment indicated that drug abuse was an issue for students, drug abuse prevention should have been addressed as part of implementation of a multi-tiered behavioral framework.

The Department developed a variety of measures to assess the performance of the 2014 cohort of School Climate Transformation Grants to LEAs, including (1) measures related to increasing the capacity of LEAs to implement a multi-tiered, decision-making framework to improve behavioral and learning outcomes and (2) measures to demonstrate the progress of LEAs in achieving these outcomes as evidenced by decreasing student disciplinary actions and increased student attendance. Among those measures, the two discussed below are the most directly related to the drug prevention function of this program.

Final performance data for the 2014 cohort of grants would have been included in the Department’s FY 2019 Performance Summary Report, but the grants were on no-cost extensions as of a year ago had not yet submitted their final performance reports. Due to COVID-19, the grantees are operating under further
No-Cost Extensions. For that reason, as explained below, data for two of the measures in this section of the Report are based on only 50 of the 70 grantees.

**Measure 1:** The number and percentage of schools that report an annual decrease in suspensions and expulsions, including those related to possession or use of drugs or alcohol.

**Table 1**

<table>
<thead>
<tr>
<th>Year</th>
<th>Number Target</th>
<th>Number Actual</th>
<th>Percentage Target</th>
<th>Percentage Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td></td>
<td>524</td>
<td></td>
<td>51%</td>
</tr>
<tr>
<td>2016</td>
<td></td>
<td>540</td>
<td></td>
<td>59%</td>
</tr>
<tr>
<td>2017</td>
<td>698</td>
<td>61%</td>
<td>53%</td>
<td></td>
</tr>
<tr>
<td>2018</td>
<td>719</td>
<td>781</td>
<td>53%</td>
<td></td>
</tr>
<tr>
<td>2019</td>
<td>804</td>
<td>516</td>
<td>63%</td>
<td>44%</td>
</tr>
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</table>

**The Measure.** ED established several GPRA performance measures for assessing the effectiveness of the FY 2014 cohort of School Climate Transformation Grants to LEAs. Two measures were related to addressing the goals of the National Drug Control Strategy. This measure was one of the two selected for that purpose.

It is expected that grantees may show progress in meeting this measure due to improvement in school climate that results in a decrease in actual student use of drugs or alcohol, and as a result these students do not face disciplinary action for such use. Alternatively, grantees may show progress because they change their disciplinary approach to student drug or alcohol use and take a more supportive disciplinary approach to addressing the behavior, rather than relying on suspensions and expulsions.

**FY 2019 Performance Results**

FY 2019 was the final performance period for the FY 2014 cohort. Of the 70 grantees, in fiscal year (FY) 2020, 20 grantees requested and were approved for No-Cost Extensions under the Department’s Administrative Relief for discretionary grantees impacted by the Coronavirus disease - 2019 (COVID-19) offer. This relief, which was offered to grantees affected by the loss of operational capacity and increased costs due to the COVID-19 crisis, allows grantees until December 31, 2021 to submit their final performance reports. The 2019 actuals in Table 1 are preliminary data for the final year(s) of these projects based on final reports from 50 of the 70 grantees. More complete data should be available later this year and may be included in the Department’s FY 2021 Performance Summary Report. Worsening performance in the FY 2019 performance period (both when actual data are compared to FY 2018 actual data
and to falling short of FY 2019 targets) is almost certainly due to the COVID-19 crisis.

**FY 2020 Performance Target.** Targets for FY 2020 are not applicable, because FY 2019 was the final performance period for these grants.

**Tables 2, 3, and 4**

Grantees are not required to collect and report to the Department disaggregated data corresponding to suspensions and expulsions that are related to possession or use of alcohol or drugs only, but some grantees voluntarily report such information. Accordingly, for such grantees, beginning with the FY 2016 baseline data available for this performance measure, the Department is reporting this more detailed data in the tables below. Because grantees were not required to collect or report these data, no targets were set for these additional measures.

**Table 2:** Number and percentage of schools that report an annual decrease in suspensions and expulsions related to possession or use of alcohol only. Out of a total of 70 grantees, 31 grantees reported these data measures for FY 2016; 6 grantees reported data for FY 2017; none reported data for FY 2018; and to date, none reported data for the final FY 2019 performance period. Because grantees were not required to collect or report these data, no targets were set for these additional measures. If any grantees report additional data on this measure by the end of calendar year 2021, such data may be included in the Department’s FY 2021 Performance Summary Report.

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<thead>
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<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>n/a</td>
<td>n/a</td>
<td>184 40%</td>
<td>17 41%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Table 3:** Number and percentage of schools that reported an annual decrease in suspensions and expulsions related to possession or use of other drugs only. Out of a total of 70 grantees, 32 grantees reported data for FY 2016, 8 grantees reported data for FY 2017; none reported data for FY 2018; and to date, none reported data for the final FY 2019 performance period. If any grantees report additional data on this measure by the end of calendar year 2021, such data may be included in the Department’s FY 2021 Performance Summary Report.

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<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>n/a</td>
<td>n/a</td>
<td>204 41%</td>
<td>19 20%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Table 4: Number and percentage of schools that reported an annual decrease in suspensions and expulsions related to possession or use of alcohol and/or other drugs. Out of a total of 70 grantees, 41 grantees reported data for FY 2016; 21 grantees reported data for FY 2017; none reported data for FY 2018; and to date, none reported data for the final FY 2019 performance period. If any grantees report additional data on this measure by the end of calendar year 2021, such data may be included in the Department’s FY 2021 Performance Summary Report.

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<thead>
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<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>n/a</td>
<td>n/a</td>
<td>269</td>
<td>201</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Measure 2: The number and percentage of schools annually that are implementing the multi-tiered behavioral framework (MTBF) with fidelity.

Table 5

<table>
<thead>
<tr>
<th>Year</th>
<th>Number Target</th>
<th>Number Actual</th>
<th>Percentage Target</th>
<th>Percentage Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td>512</td>
<td>512</td>
<td>45%</td>
<td>45%</td>
</tr>
<tr>
<td>2016</td>
<td>589</td>
<td>584</td>
<td>52%</td>
<td>55%</td>
</tr>
<tr>
<td>2017</td>
<td>677</td>
<td>814</td>
<td>60%</td>
<td>65%</td>
</tr>
<tr>
<td>2018</td>
<td>936</td>
<td>920</td>
<td>69%</td>
<td>64%</td>
</tr>
<tr>
<td>2019</td>
<td>1,077</td>
<td>572</td>
<td>79%</td>
<td>68%</td>
</tr>
</tbody>
</table>

The Measure. ED established several GPRA performance measures for assessing the effectiveness of the FY 2014 cohort of School Climate Transformation Grants to LEAs. Two measures were related to addressing the goals of the National Drug Control Strategy. This measure was one of the two selected for that purpose.

Although schools have long attempted to address issues of student disruptive and problem behavior (including substance use, violence, and bullying), most of our Nation’s schools have not implemented comprehensive, effective supports that address the full range of students' social, emotional, and behavioral needs. Research demonstrates that the implementation of an evidence-based, multi-tiered behavioral framework, such as Positive Behavioral Interventions and Supports (PBIS), can help improve overall school climate and safety. A key aspect of this multi-tiered approach is providing differing levels of support and interventions to students based on their needs. Certain supports involve the whole school (e.g., consistent rules, consequences, and reinforcement of appropriate behavior), with more intensive supports for groups of students...
exhibiting at-risk behavior, and individualized services for students who continue to exhibit troubling behavior.

This second measure supports the drug prevention function of this program because a school that is implementing a multi-tiered behavioral framework with fidelity can be expected to be a school where any prevention program(s) – including drug prevention program(s) – selected for implementation is (1) an evidence-based program and (2) has an improved chance of being implemented more effectively. This measure is designed to inform whether the LEA School Climate Transformation Grants result in such increased capacity.

**FY 2019 Performance Results.**

Of the 70 grantees, in FY 2020, 20 grantees requested and were approved for a No-Cost Extension under the Department’s Administrative Relief for discretionary grantees impacted by the Coronavirus disease - 2019 (COVID-19) offer. This relief, which was offered to grantees affected by the loss of operational capacity and increased costs due to the COVID-19 crisis, allows grantees until December 31, 2021 to submit their final performance reports. The FY 2019 actuals in Table 5 reflect preliminary performance data based on the 50 grantees that have submitted final performance reports. More complete data should be available later this year and may be included in the Department’s FY 2021 Performance Summary Report. Worsening performance in FY 2019 (both when actual data are compared to FY 2018 actual data and to falling short of FY 2019 targets) is almost certainly due to the COVID-19 crisis. Regardless, there was one improvement among the metrics for this performance measure. The percentage of schools implementing the multi-tiered behavioral framework (MTBF) with fidelity increased from 64 percent to 68 percent between FY 2018 and FY 2019.

**FY 2020 Performance Target.** Targets for FY 2020 are not applicable, because FY 2019 was the final performance period for these grants.

**Methodology.** These measures constitute the Department’s indicators of success for the School Climate Transformation Grant – Local Educational Agency Grants program 2014 cohort. Consequently, we advised applicants for a grant under this program to give consideration to these measures in conceptualizing the approach and evaluation for their proposed program. Each grantee is required to provide, in its annual performance and final reports, data about progress in meeting these measures.

To receive funds after the initial year of a multi-year award, grantees must submit an annual continuation performance report that describes the progress the project has made toward meeting the predefined benchmarks and milestones. This performance report also provides program staff with data related to the GPRA measures established for the program.
Authorized representatives for the grant site sign the annual performance report and, in doing so, certify that to the best of their 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 will not conduct further reviews unless data quality concerns arise.

The ED-funded Technical Assistance Center on Positive Behavioral Interventions and Supports (www.pbis.org) is providing training and technical assistance to grantees on data collection.
In FY 2019, the Department made a new round of awards under the School Climate Transformation Grant – Local Educational Agency (LEA) program to 69 school districts. The grants provide funding for up to five years, for a total of nearly $218 million. The funds are being used to develop, enhance, or expand systems of support for, and technical assistance to, schools implementing a multi-tiered system of support for improving school climate. The goals of the program are to connect children, youth, and families to appropriate services and supports; improve conditions for learning and behavioral outcomes for school-aged youth; and increase awareness of and the ability to respond to mental-health issues among school-aged youth.

The Department established several GPRA performance measures for assessing the effectiveness of the FY 2019 cohort of the School Climate Transformation Grants to LEAs program. Four of the measures relate to addressing the goals of the National Drug Control Strategy.

**Measure 1.** The number and percentage of schools annually that are implementing a multi-tiered system of support framework with fidelity.

**Table 1**

<table>
<thead>
<tr>
<th>Year</th>
<th>Number Target</th>
<th>Number Actual</th>
<th>Percentage Target</th>
<th>Percentage Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020</td>
<td></td>
<td>305</td>
<td></td>
<td>45%</td>
</tr>
<tr>
<td>2021</td>
<td>314</td>
<td></td>
<td>48%</td>
<td></td>
</tr>
</tbody>
</table>

**The Measure:**
Similar to Measure 2 for the 2014 SCTG-LEA cohort, this measure supports the drug prevention function of this program because a school that is implementing a multi-tiered system of support framework with fidelity can be expected to be a school where any prevention program(s) – including drug prevention program(s) – selected for implementation is (1) an evidence-based program and (2) has an improved chance of being implemented more effectively. This measure is designed to inform whether the LEA School Climate Transformation Grant results in an increased capacity.

**FY 2020 Performance Results.** FY 2020 performance data have been received from 56 of the 69 grantees and have been aggregated; 13 grantees did not submit data due to the loss of operational capacity and impacts from the COVID-19 pandemic. As shown in Table 1 above, the 56 grantees reported that 305
schools, or 45 percent of those participating, implemented the multi-tiered behavioral framework with fidelity. More complete data should be available later this year; if so, it will be included in the Department’s FY 2021 Performance Summary Report.

**FY 2021 Performance Target.** The FY 2021 performance targets for the number and percentage of schools annually that are implementing the multi-tiered behavioral framework with fidelity are set at 314 and 48 percent, respectively. These targets represent an annual increase of 3 percent and 3 percentage points, respectively.

**Measure 2.** The number and percentage of schools annually that are implementing opioid abuse prevention and mitigation strategies.

**Table 2**

<table>
<thead>
<tr>
<th>Year</th>
<th>Number Target</th>
<th>Number Actual</th>
<th>Percentage Target</th>
<th>Percentage Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020</td>
<td>314</td>
<td>196</td>
<td>48%</td>
<td>42%</td>
</tr>
<tr>
<td>2021</td>
<td>202</td>
<td>45%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**The Measure:** Measure 2 addresses the opioid crisis and its devastation on families and communities across the United States, and the belief that schools can play an important role in both preventing opioid abuse and addressing the mental health and other needs of students affected by the epidemic. Accordingly, in the FY 2019 competition for School Climate Transformation Grants to LEAs, the Department included a competitive preference priority for applicants that proposed to implement opioid abuse prevention and/or mitigation strategies. Sixty-eight of the 69 grantees addressed this priority. Measure 2 is designed to drill down below the grantee (i.e., LEA) level to determine how many (and what percentage of) schools served by the grant are implementing opioid abuse prevention and mitigation strategies.

**FY 2020 Performance Results.** FY 2020 performance data have been received from 48 of the 69 grantees and have been aggregated. Of the 69 grantees, 21 grantees did not submit data due to the loss of operational capacity and impacts from the COVID-19 pandemic. As shown in Table 2 above, the 48 grantees reported that 196 schools, or 42 percent of those participating, implemented opioid abuse prevention and mitigation strategies. More complete data should be available later this year; if so, it will be included in the Department’s FY 2021 Performance Summary Report.

**FY 2021 Performance Target.** The FY 2021 performance targets for the number and percentage of schools annually that are implementing opioid abuse prevention and mitigation strategies are set at 202 and 45 percent, respectively.
These targets represent an annual increase 3 percent and of 3 percentage points, respectively.

**Measure 3.** The number and percentage of schools that report an annual decrease in suspensions and expulsions related to possession or use of alcohol.

<table>
<thead>
<tr>
<th>year</th>
<th>number target</th>
<th>number actual</th>
<th>percentage target</th>
<th>percentage actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020</td>
<td>281</td>
<td></td>
<td>61%</td>
<td></td>
</tr>
<tr>
<td>2021</td>
<td>289</td>
<td></td>
<td>64%</td>
<td></td>
</tr>
</tbody>
</table>

**The Measure:** Similar to the FY 2014 cohort measure for the School Climate Transformation Grants to LEAs, it is expected that grantees may show progress in meeting this measure due to improvement in school climate that results in a decrease in actual student use of alcohol, and as a result these students do not face disciplinary actions for such use. Alternatively, grantees may show progress within their disciplinary approach to student alcohol use and take a more supportive disciplinary approach to addressing the behavior, rather than relying on suspensions and expulsions.

**FY 2020 Performance Results.** FY 2020 performance data have been received from 49 of the 69 grantees and have been aggregated. Of the 69 grantees, 20 grantees did not submit data due to the loss of operational capacity and impacts from the COVID-19 pandemic, and/or unavailable baseline data. As shown in Table 3 above, the 49 grantees reported that 281 schools, or 61 percent of those participating, had an annual decrease in suspensions and expulsions related to possession or use of alcohol. If more complete data should become available later this year, they will be included in the Department’s FY 2021 Performance Summary Report.

**FY 2021 Performance Target.** The FY 2021 performance targets for the number and percentage of schools annually that report an annual decrease in suspensions and expulsions related to possession or use of alcohol are set at 289 and 64 percent, respectively. These targets represent an annual increase of 3 percent and 3 percentage points, respectively.

**Measure 4.** The number and percentage of schools that report an annual decrease in suspensions and expulsions related to possession or use of other drugs.
Table 4

<table>
<thead>
<tr>
<th>Year</th>
<th>Number Target</th>
<th>Number Actual</th>
<th>Percentage Target</th>
<th>Percentage Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020</td>
<td>288</td>
<td></td>
<td>57%</td>
<td></td>
</tr>
<tr>
<td>2021</td>
<td>297</td>
<td>60%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The Measure: Similar to the FY 2014 cohort measure for the School Climate Transformation Grants to LEAs, it is expected that grantees may show progress in meeting this measure due to improvement in school climate that results in a decrease in actual students’ use of drugs, and as a result, these students do not face disciplinary actions for such use. Alternatively, grantees may show progress within their disciplinary approach to student drug use and take a more supportive disciplinary approach to addressing the behavior, rather than relying on suspensions and expulsions.

FY 2020 Performance Results. FY 2020 performance data have been received from 49 of the 69 grantees and have been aggregated. Of the 69 grantees, 20 grantees did not submit data due to the loss of operational capacity and impacts from the COVID-19 pandemic, and/or unavailable baseline data. As shown in Table 4 above, the 49 grantees reported that 288 schools, or 57 percent of those participating, had an annual decrease in suspensions and expulsions related to possession or use of other drugs. If more complete data should become available later this year, they will be included in the Department’s FY 2021 Performance Summary Report.

FY 2021 Performance Target. The FY 2021 performance targets for the number and percentage of schools annually that report an annual decrease in suspensions and expulsions related to possession or use of other drugs are set at 297 and 60 percent, respectively. These targets represent an annual increase of 3 percent and 3 percentage points, respectively.

Methodology. These measures constitute the Department's indicators of success for the School Climate Transformation Grant – Local Educational Agency program FY 2019 cohort. Consequently, applicants for a grant under this program were advised to give careful consideration to these measures in conceptualizing the approach, and the evaluation of, their proposed program. Each grantee is required to provide, in its annual performance and final reports, data about progress in meeting these measures.

To receive funds after the initial year of a multi-year award, grantees must submit an annual performance report that describes the progress the project has made toward meeting the predefined benchmarks and milestones. This performance report also provides program staff with data related to the GPRA measures established for the 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 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 relies on the certification concerning data supplied by grantees and will not conduct further reviews, unless data quality concerns arise. The ED-funded Technical Assistance Center on Positive Behavioral Interventions and Supports (www.pbis.org) provides on-going training and technical assistance on data collection.

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 2020 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 for not meeting performance targets are reasonable given past experience, available information, and available resources. No recommendations for plans to revise performance targets are needed, because the only targets not met were for the last performance period for the applicable grants.

**Methodology for Establishing Performance Targets**

The methodology described to establish performance targets for FY 2021 is reasonable given past performance, current circumstances, and available resources. It should be noted that 100 percent of the grantees were affected by unanticipated school closures and restructuring instruction because of the COVID-19 pandemic. The Department has set FY 2021 targets anticipating a relatively small improvement in performance over FY 2020 based on reasonable expectations of grantees’ continued progress, with possible modifications, and due to delays in FY 2020 activities.
Performance Measures for Significant Drug Control Activities

The Department of Education has established at least one acceptable performance measure for the Drug Control Decision Unit identified in its Detailed Accounting of Fiscal Year 2020 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, or will be stored, in the Department of Education’s PPI-JIRA (Program Performance Information) system. Data from PPI-JIRA are used in developing annual budget requests and justifications.
February 18, 2021

TO: Paul Kesner
Director, Office of Safe and Supportive Schools
Office of Elementary and Secondary Education

FROM: Bryon S. Gordon /s/
Assistant Inspector General for Audit


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

Attachment


Our review was conducted in accordance with generally accepted government auditing standards for attestation review engagements. 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: National Drug Control Program Agency Compliance Reviews, dated October 22, 2019.

Bryon S. Gordon /s/
Assistant Inspector General for Audit