



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF SAFE AND DRUG-FREE SCHOOLS

January 31, 2011

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 2010*, 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,

A handwritten signature in blue ink, reading "Kevin B. Jennings", is positioned above the printed name.

Kevin Jennings
Assistant Deputy Secretary

Enclosure #1: Department of Education Performance Summary Report for Fiscal Year 2010, January 19, 2011

Enclosure #2: Authentication letter from Keith West, Assistant Inspector General for Audit Services, January 31, 2011

cc: Keith West

Department of Education



Performance Summary Report

Fiscal Year 2010

In Support of the

National Drug Control Strategy

As required by ONDCP Circular: *Drug Control Accounting*

January 19, 2011

Department of Education

Performance Summary Report for Fiscal Year 2010

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UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF SAFE AND DRUG-FREE SCHOOLS

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 2010 budgetary resources for the Department of Education are displayed in the Fiscal Year 2011 *National Drug Control Budget Summary*.

Consistent with the instructions in the ONDCP Circular, please provide your authentication to me in writing and I will transmit it to ONDCP along with the enclosed Performance Summary Report. As you know, ONDCP requests these documents by February 1, 2011. Please do not hesitate to contact me if you have any questions about the enclosed information.

Sincerely,

Kevin Jennings

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www.ed.gov

Our mission is to ensure equal access to education and to promote educational excellence throughout the nation.

Performance Summary Information

Safe Schools/Healthy Students

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

Table 1

Cohort	FY2006 Actual	FY 2007 Actual	FY2008 Actual	FY2009 Actual	FY2010 Target	FY 2010 Actual	FY2011 Target
2005	n/a	43.8	34.2	Pending	n/a	n/a	n/a
2006	n/a	66.7	66.7	66.7	80.0	pending	n/a

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

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

FY 2010 Performance Results. Sites were not required to provide or collect baseline data at the time of application or before program interventions were implemented, so grantees provide baseline data for their selected measures related to drug use after year one of program implementation (for example in FY 2006 for the FY 2005 cohort). Grantees from the FY 2005 cohort generally completed no-cost extensions and provided GPRA data in their final grantee reports; aggregation of this data is currently not completed in order to report FY 2009 actual performance.

The SS/HS National Evaluation contractor (supported by HHS/SAMHSA) performs the initial review and cleaning of GPRA performance data received by SS/HS grantees. The contract was not specific about reviewing and cleaning data received in final reports. FY 2009 data for the 2005 SS/HS cohort is included in their final performance report. HHS/SAMHSA recently made a

decision to review and clean data during the project period, excluding the no-cost extension year and final report. We are currently discussing options for compiling these performance results and getting this task completed given available resources.

The FY 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 are currently being reviewed, with data available on grantee performance in FY 2010 available in spring 2011.

FY 2011 Performance Targets. Targets for the two earliest cohorts were initially established before any performance data for this measure were received, and represented our best judgment at the time, given the significant size of SS/HS grants and the emphasis on research-based programs that is central to the initiative. We elected in 2008 to revise the target for the FY 2005 cohort for this measure based on the actual performance to date (implementation year two) of the FY 2004 cohort. Based on our professional judgment, it seemed that the revised target of 86.25 percent was appropriately aggressive and that attaining that target would be a meaningful outcome for the program, while acknowledging that our original target of 90 percent for the initial (FY 2004) cohort may have been unrealistic. In 2008 we also developed revised targets for the FY 2006 cohort, again, based on the limited data available for this measure. We have made no additional revisions to targets for these cohorts at this time, except for substituting a numeric target (of 73.4 percent) in place of "maintain a baseline" as the 2008 target for the 2006 cohort.

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

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

Both the 2005 and 2006 grant cohorts are in their close-out phases and the grants will not be operating in FY 2011. Thus, no targets were set for FY 2011.

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

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

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

Cohort	FY2008 Actual	FY2009 Actual	FY2010 Target	FY2010 Actual	FY2011 Target
2007	53.8	42.9	56.5	Pending	59.9
2008	n/a	50.0	51.0	Pending	52.5
2009	n/a	n/a	Set a baseline	Pending	Baseline + 2%

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

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

FY 2010 Performance Results.

FY 2010 targets for this measure were not established in last year's report as we were awaiting aggregation and analysis of FY 2008 and FY 2009 data from the FY 2007 cohort to help inform the setting of targets.

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.

The FY 2007 cohort provided baseline and year 1 actual [performance] data in FY 2008. This data was not available in the last report but has since been received along with actual data for FY 2009. Actual data for FY 2010 are currently being reviewed and aggregated, thus are not included in this report.

The FY 2008 cohort provided baseline and year 1 actual [performance] in FY 2009 and is included in this report. Actual data for FY 2010 are currently being reviewed and aggregated, thus are not included in this report.

The FY 2009 cohort recently submitted baseline and year 1 actual [performance] data. These data are currently being reviewed and aggregated, thus are not included in this report.

FY 2011 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, 6, and 9 percent for the 2007, 2008, and 2009 cohorts. Additionally, a cap of 85 percent was set as the maximum target for the measure given ceiling effects.

For the 2009 cohort we are awaiting the final aggregation of first year performance data in order to set a baseline against which to apply the 2011 target of plus 2 percent on which the target for FY 2011 will be based.

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

Cohort	FY2008 Actual	FY2009 Actual	FY2010 Target	FY2010 Actual	FY2011 Target
2007	71.4	47.8	75.0	pending	79.5
2008	n/a	56.0	57.1	pending	58.8
2009	n/a	n/a	Set a baseline	pending	Baseline + 2%

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 2010 Performance Results.

FY 2010 targets for this measure were not established in last year's report as we were awaiting aggregation and analysis of FY 2008 and FY 2009 data from the FY 2007 cohort to help inform the setting of targets.

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.

The FY 2007 cohort provided baseline and year 1 actual [performance] data in FY 2008. This data was not available in the last report but has since been received along with actual data for FY 2009. Actual data for FY 2010 are

currently being reviewed and aggregated and, thus, are not included in this report.

The FY 2008 cohort provided baseline and year 1 actual [performance] in FY 2009 and is included in this report. Actual data for FY 2010 are currently being reviewed and aggregated, thus are not included in this report.

The FY 2009 cohort recently submitted baseline and year 1 actual [performance] data. These data are currently being reviewed and aggregated, thus are not included in this report.

FY 2011 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, 6, and 9 percent for the 2007, 2008, and 2009 cohorts. Additionally, a cap of 85 percent was set as the maximum target for the measure given ceiling effects.

For the 2009 cohort we are awaiting the final aggregation of first year performance data in order to set a baseline against which to apply the 2011 target of plus 2 percent on which the target for FY 2011 will be based.

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

Table 4

Cohort	FY2006 Actual	FY2007 Actual	FY2008 Actual	FY2009 Actual	FY2010 Target	FY2010 Actual	FY2011 Target
2005	n/a	no valid data available	no valid data available	no valid data available	n/a	n/a	n/a
2006	n/a	n/a	66.7	12.5	70.0	57.0	n/a
2007	n/a	n/a	33.0	41.7	60.0	50.0	n/a
2008	n/a	n/a	n/a	49.0	50.0	65.0	70.0

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.

FY 2010 Performance Results. FY 2010 performance data for the FY 2006, 2007, and 2008 cohorts are included in table 4 above.

During FY 2008 we completed a review of data submitted to date by the FY 2005 cohort for this measure and identified significant concerns about the quality and

comparability of the data. Grant sites had reported on prevalence rates for a variety of illegal drugs and did not always provide data from the same items/elements across project years one and two. Also, some sites surveyed their entire student population and others surveyed only students in the testing pool.

Based on these concerns, we obtained assistance from the U.S. Department of Education's Data Quality Initiative contractor. With the contractor's help, we created and disseminated detailed data collection and reporting guidance for the program, as well as data standards that we will use to determine what constitutes valid data for this measure. We disseminated this guidance to FY 2007 grantees during project implementation, but were able to provide the guidance to the new cohort of 2008 grantees at the start of their projects. Based on that guidance, as well as data quality and aggregation checks, in FY 2010 we aggregated available data from the FY 2007 and 2008 cohorts and recorded those data in the Department's software that houses GPRA measures and data.

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

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

It is difficult to assess why performance results for the 2006 and 2007 cohorts fell short of the established targets for this measure in FY 2010, whereas the 2008 cohort exceeded the target.

We have carefully considered program performance reports submitted by grantees, as well as our experience in monitoring and providing technical assistance to grantees, and have identified some challenges that may have impeded grant performance. Some common problems include turnover in leadership (at the school board, authorized representative or project director level) and challenges with collecting and reporting valid data about the measure. Another variable that might affect performance in sites is related to project design. For example, we're not certain how to assess the likely impact of a random student drug testing intervention on students who volunteer to be included in the testing pool, versus students who are forced to be tested as a condition of participation in extracurricular activities.

Finally, cohort size and composition varies from cohort to cohort. In some years funding for a large amount of new awards was available and in others only a

handful of sites received grants. To the extent that our peer review results that are used to rank order applications and select grantees accurately predict project quality, the range of scores funded (and perhaps the range of project quality) varies from fiscal year to fiscal year.

We believe that an equally important dimension in assessing performance against established targets for this measure is our ability to correctly predict targets for measures. Because there is limited available research and no “industry” standard available to guide expectations for performance, generally we have used the performance of prior cohorts on the measure to establish targets for subsequent cohorts. Because of the need to establish targets for future cohorts before a single cohort has completed project implementation and submitted final data, we have based targets on information provided over a fairly limited amount of time, often reflecting the results of less than a single cohort of complete performance information.

This situation introduced two possible problems into the target setting process - that targets are being based in some part on a subset of grantees that are not representative of the cohort as a whole, and that those sites able to provide valid data more quickly may also have superior capacity to effectively implement program interventions. While we have placed a significant emphasis on improving data quality and have worked to improve the response rates for measures over the life of the cohort, this causes performance results from a relatively small set of grantees in year one to be compared to results for a significantly larger percentage of the cohort by the end of project.

Increasingly, it is clear that a series of variables serve to make each cohort unique, and that the issue of how we have established targets for this measure has been problematic. Revised FY 2010 processes for establishing targets for this measure are discussed in the FY 2011 Performance Targets section below.

FY 2011 Performance Targets. We first established targets for the percentage of grantees experiencing a 5 percent reduction in current illegal drug use after reviewing the first two years of data for the FY 2003 cohort of grant sites. Consistent with research that suggests that changes in student behavior related to student drug testing may not be realized immediately, we assumed that we could look for an increased number of grantees to experience positive change and, using our professional judgment, set that target at 50 percent of grantees.

We have since received data for three project years from this single cohort of sites (the FY 2003 cohort), and the information provided by the grantees did not provide an adequate basis for revisiting targets for future cohorts. This cohort was very small (eight grantees), and also experienced extensive delays in implementation and data collection activities. Because only a handful of grantees were able to eventually provide data specific to the measure, we do not

believe that it would be appropriate to base expectations about the performance of other cohorts on this limited information.

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

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 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 decided to establish numerical performance targets after baseline data is received for the new cohort. We entered 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 helped us better match targets to cohort performance, and reflect the unique characteristics of each cohort.

The 2008 cohort is the only cohort for which a target is established for FY 2011, and it is based on the revised target setting approach described above. Only a portion of the FY 2006 cohort, and small number of grants, will be operational in FY 2011 in a no-cost extension phase of their grants. Each have different project end dates making comparisons with prior year actual performance difficult. The FY 2007 cohort generally ended in FY 2010, with limited no-cost extension activity and therefore no FY 2011 targets are set for this cohort.

Methodology With the exception of the FY 2006 cohort, data are collected by grantees using student surveys. Data are provided as part of the grantees' annual performance reports. Generally, grantees 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. Survey items may relate to different substances, but must collect information concerning current use in order to be included in the data reported for this measure. Grantees did not provide baseline data in their applications, so we had to wait until grantees provided data both from project year one and two in order to determine if they have experienced a decrease in substance abuse.

Beginning with the FY 2008 cohort, we 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.

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

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

Data for the FY 2006 cohort were collected as part of an evaluation of student drug testing. Data through FY 2010 for the measures were collected by the evaluation contractor, using common survey items and collection procedures. Survey responses are analyzed by the contractor and data are provided to the Department.

The anticipated levels of decrease in substance abuse are consistent with the national goals for the reduction of underage drug use included in the National Drug Control Strategy in effect when SDT grants were awarded— five percent per year. Targets were initially established following the report of baseline data for grant sites from the FY 2003 cohort but, as discussed above, we adjusted our method of setting targets.

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

Table 5

Cohort	FY2006 Actual	FY2007 Actual	FY2008 Actual	FY2009 Actual	FY2010 Target	FY2010 Actual	FY2011 Target
2005	n/a	no valid data available	no valid data available	no valid data available	n/a	n/a	n/a

2006	n/a	n/a	55.5	12.5	60.0	57.0	n/a
2007	n/a	n/a	33.0	33.3	60.0	54.0	n/a
2008	n/a	n/a	n/a	58.0	60.0	58.0	65.0

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

This measure is directly related to the National Drug Control Strategy's goal related to preventing drug use before it starts. Student drug testing was prominently featured in annual editions of the National Drug Control Strategy between 2003 and 2009 as a recommended drug prevention intervention. FY 2008 was the last cohort of new grants made under the program.

FY 2010 Performance Results.

FY 2010 performance data for the FY 2006, 2007, and 2008 cohorts are included in the chart for this measure above.

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

Based on these concerns, we obtained assistance from the U.S. Department of Education's Data Quality Initiative contractor. With the contractor's help, we created and disseminated detailed data collection and reporting guidance for the program, as well as data standards that we will use to determine what constitutes valid data for this measure. We disseminated this guidance to FY 2007 grantees during project implementation, but were able to provide the guidance to the new cohort of 2008 grantees at the start of their projects. Based on that guidance, as well as data quality and aggregation checks, in FY 2010 we aggregated available data from the FY 2007 and 2008 cohorts and recorded those data in the Department's software that houses GPRA measures and data.

Data for the FY 2006 cohort came from the evaluation conducted for the Department of Education by a contractor. Data for this cohort were collected by the contractor annually; the data reported in the chart above reflect the progress of cohort grant sites based on aggregate information at the grantee level about

changes in prevalence of drug use among each grantee's students surveyed by the contractor.

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

It is difficult to assess why performance results for the 2006, 2007, 2008 cohorts fell slightly short of the established targets for this measure in FY 2010.

We have carefully considered program performance reports submitted by grantees, as well as our experience in monitoring and providing technical assistance to grantees, and have identified some challenges that may have impeded grant performance. Some common problems include turnover in leadership (at the school board, authorized representative or project director level) and challenges with collecting and reporting valid data about the measure. Another variable that might affect performance in sites is related to project design. For example, we're not certain how to assess the likely impact of a random student drug testing intervention on students who volunteer to be included in the testing pool, versus students who are forced to be tested as a condition of participation in extracurricular activities.

Finally, cohort size and composition varies from cohort to cohort. In some years funding for a large amount of new awards was available and in others only a handful of sites received grants. To the extent that our peer review results that are used to rank order applications and select grantees accurately predict project quality, the range of scores funded (and perhaps the range of project quality) varies from fiscal year to fiscal year.

We believe that an equally important dimension in assessing performance against established targets for this measure is our ability to correctly predict targets for measures. Because there is limited available research and no "industry" standard available to guide expectations for performance, generally we have used the performance of prior cohorts on the measure to establish targets for subsequent cohorts. Because of the need to establish targets for future cohorts before a single cohort has completed project implementation and submitted final data, we have based targets on information provided over a fairly limited amount of time, often reflecting the results of less than a single cohort of complete performance information.

This situation introduced two possible problems into the target setting process – that targets are being based in some part on a subset of grantees that are not representative of the cohort as a whole, and that those sites able to provide valid data more quickly may also have superior capacity to effectively implement program interventions. While we have placed a significant emphasis on improving data quality and have worked to improve the response rates for

measures over the life of the cohort, this causes performance results from a relatively small set of grantees in year one to be compared to results for a significantly larger percentage of the cohort by the end of project.

Increasingly, it is clear that a series of variables serve to make each cohort unique, and that the issue of how we have established targets for this measure has been problematic. Revised FY 2010 processes for establishing targets for this measure are discussed in the FY 2011 Performance Targets section below.

FY 2011 Performance Targets. We first established targets for the percentage of grantees experiencing a 5 percent reduction in past-year illegal drug use after reviewing the first two years of data for the FY 2003 cohort of grant sites. Consistent with research that suggests that changes in student behavior related to student drug testing may not be realized immediately, we assumed that we could look for an increased number of grantees to experience positive change and, using our professional judgment, set that target at 50 percent of grantees.

We have since received data for three project years from this single cohort of sites (the FY 2003 cohort), and the information provided by the grantees did not provide an adequate basis for revisiting targets for future cohorts. This cohort was very small (eight grantees), and also experienced extensive delays in implementation and data collection activities. Because only a handful of grantees were able to eventually provide data specific to the measure, we do not believe that it would be appropriate to base expectations about the performance of other cohorts on this limited information.

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

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 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 decided to establish numerical performance targets after baseline data is received for the new cohort. We entered 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 helped us better match targets to cohort performance, and reflect the unique characteristics of each cohort.

The 2008 cohort is the only cohort for which a target is established for FY 2011, and it is based on the revised target setting approach described above. Only a portion of the FY 2006 cohort, and small number of grants, will be operational in FY 2011 in a no-cost extension phase of their grants. Each have different project end dates making comparisons with prior years actual performance difficult. The FY 2007 cohort generally ended in FY 2010, with limited no-cost extension activity and therefore no FY 2011 targets are set for this cohort.

Methodology With the exception of the FY 2006 cohort, data are collected by grantees using student surveys. Data are provided as part of the grantees' annual performance reports. Generally, grantees prior to the 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. Survey items may relate to different substances, but must collect information concerning current use in order to be included in the data reported for this measure. Grantees did not provide baseline data in their applications, so we had to wait until grantees provided data both from project year one and two in order to determine if they have experienced a decrease in substance abuse.

Beginning with the FY 2008 cohort, we asked grantees to provide data for past-year 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.

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

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

Data for the FY 2006 cohort were being collected as part of an evaluation of student drug testing. Data through FY 2010 for the measures were collected by the evaluation contractor, using common survey items and collection procedures.

Survey responses are analyzed by the contractor and data are provided to the Department.

The anticipated levels of decrease in substance abuse are consistent with the national goals for the reduction of underage drug use included in the National Drug Control Strategy in effect when SDT grants were awarded— five percent per year. Targets were initially established following the report of baseline data for grant sites from the FY 2003 cohort but, as discussed above, we adjusted our method of setting targets.

Safe and Drug-Free Schools and Communities State Grants¹

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

Table 6

FY 2005 Actual	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009	FY 2009 Actual	FY 2010
25.4	None	22.3	None	26	22.7	None

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

FY 2009 and 2010 Performance Results. Data for this measure were collected in 2009, but were not released by the Centers for Disease Control and Prevention until summer 2010. No target was established for this measure for FY 2010 because data is collected only every other year, in odd-numbered years and the SDFSC State Grants program was terminated in FY 2010. In the past year performance report we promised to provide FY 2009 data in the FY 2010 performance summary report, but indicated we would end reporting for the measure at that time. The percentage of students in grades 9-12 who were

¹ The FY 2009 Performance Report also included two additional measures for the SDFSC State Grant program, numbered measures 9 and 10 in that report, relating to the percentage of drug and violence prevention programs/practices supported with SDFSC State Grant funds that are research based, and the percentage of drug and violence prevention curriculum programs that are implemented with fidelity. As indicated in that report, FY 2010 targets were not set for these measures, and no additional performance data would be available for these measures due to the enacted FY 2010 appropriations statute that did not provide funding for the State Grant program.

offered, sold, or given an illegal drug on school property during the past 12 months increased from 1993 to 1995, and decreased from 1995 to 2009.

FY 2011 Performance Targets. The SDFSC State Grants program was terminated in FY 2010 and no targets are set for FY 2011.

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

Detailed information about the methodology used to sample and report data for the YRBSS is available at the CDC website. We rely on the assertions provided about methodology presented by CDC in using this data to report on performance of SDFSC State Grants.

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

Table 7

FY 2005 Actual	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009 Target	FY 2009 Actual	FY 2010 Target
20.2	None	19.7	None	18.0	20.8	None

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

FY 2009 and 2010 Performance Results. Data for this measure were collected in 2009, but was not released by the Centers for Disease Control and Prevention until summer 2010. No target was established for this measure for FY 2010 because data are collected only every other year, in odd-numbered years and the SDFSC State Grants program was terminated in FY 2010. In the past year performance report we promised to provide FY 2009 data in the FY 2010 performance summary report, but indicated we would end reporting for the measure at that time. The percentage of students in grades 9-12 who used marijuana one or more times during the past 30 days increased from 1991

(14.7 percent) to 1999 (26.7 percent) and has decreased since then to 20.8 percent in 2009.

FY 2011 Performance Targets. The SDFSC State Grants program was terminated in FY 2010 and no targets are set for FY 2011.

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

Detailed information about the methodology used to sample and report data for the YRBSS is available at the CDC website. We rely on the assertions provided about the methodology presented by CDC in using this data to report on performance of SDFSC State Grants.

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

Table 8

FY 2005 Actual	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009 Target	FY 2009 Actual	FY 2010 Target
25.5	None	26.0	None	25.0	24.2	None

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

FY 2009 and 2010 Performance Results. Data for this measure were collected in 2009, but were not released by the Centers for Disease Control and Prevention until summer 2010. No target was established for this measure for FY 2010 because data is collected only every other year, in odd-numbered years, and the SDFSC State Grants program was terminated in FY 2010. In the past year performance report we promised to provide FY 2009 data in the FY 2010 performance summary report, but indicated we would end reporting for the measure at that time. The percentage of students in grades 9-12 who had five or

more drinks of alcohol in row in the past 30 days did not change significantly from 1991 (31.3 percent) to 1997 (33.4 percent) but has decreased over the last decade.

FY 2011 Performance Targets. The SDFSC State Grants program was terminated in FY 2010 and no targets are set for FY 2011.

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

Detailed information about the methodology used to sample and report data for the YRBSS is available at the CDC website. We rely on the assertions provided about the methodology presented by CDC in using this data to report on performance of SDFSC State Grants.

Grants to Reduce Alcohol Abuse

Measure 11: The percentage of grantees whose target students show a measurable decrease in binge drinking. (Grants to Reduce Alcohol Abuse Program – FY 2005, 2007, 2008, 2009 cohorts – no new grants were awarded under this program in FY 2006.)

Table 11

Cohort	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009 Actual	FY 2010 Target	FY 2010 Actual	FY 2011 Target
2005	n/a	65.0	59.3	n/a	n/a	n/a	n/a
2007	n/a	n/a	61.5	47.0	49.4	pending	n/a
2008	n/a	n/a	n/a	50.7	53.2	64.0	70.0
2009	n/a	n/a	n/a	n/a	n/a	57.1	65.0

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

FY 2010 Performance Results

We are able to report on performance in FY 2010 for the 2008 and 2009 cohorts of grants. The 2008 cohort exceeded its target. No FY 2010 target was set for

the FY 2009 cohort but we are reporting actual FY 2010 performance. There is incomplete data for the 2007 cohort and we are unable to report at this time, but will do so in 2011.

As we have received data from across cohorts for this measure, we continue to find it difficult to discern a pattern of performance that can serve as a basis for establishing future targets. For example, it is difficult to assess why performance results for the 2007 and 2008 cohorts fell short of the established targets for this measure in the past. Intensive technical assistance (via contract) services were not available to the FY 2008 cohort for much of FY 2009 but was in FY 2010. This might be one reason the FY 2008 cohort exceeded its target in FY 2010.

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

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

quality and have worked to improve the response rates for measures over the life of the cohort, this causes performance results from a relatively small set of grantees in year one to be compared to results for a significantly larger percentage of the cohort by the end of project.

Increasingly, it 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. Revised processes for establishing targets for this measure are discussed in the FY 2011 Performance Targets section below.

FY 2011 Performance Targets. We established an FY 2009 target for the FY 2007 cohort based on the performance of prior cohorts in 2009. This cohort achieved performance levels after one year that were close to those met after two years by a prior cohort, but experienced a significant decline in FY 2009. Based on lower than anticipated levels of performance for this measure, we revised the FY 2010 targets for both the FY 2007 and FY 2008 cohorts for this measure. The 2010 target for the FY 2007 cohort was reduced from 80 percent to 49.4 percent (or a target level that represents a 5 percent increase of the FY 2009 actual data for this measure). The 2010 target for the FY 2008 cohort was reduced from 76.87 percent to 53.2 percent (or a target level that represents a 5 percent increase of the FY 2009 actual data for this measure).

Given these challenges, and improvements we have made in data quality (including generally requiring grantees to collect baseline data for their projects before interventions are implemented), we 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.

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 12: The percentage of grantees that show a measurable increase in the percentage of target students who believe that alcohol abuse is harmful to their health. (Grants to Reduce Alcohol Abuse – FY 2005, 2007, 2008, and 2009 cohorts – no new grants were awarded under this program in FY 2006.)

Table 12

Cohort	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009 Actual	FY 2010 Target	FY 2010 Actual	FY 2011 Target
2005	n/a	70.0	59.3	n/a	n/a	n/a	n/a
2007	n/a	n/a	69.2	76.5	80.3	n/a	n/a
2008	n/a	n/a	n/a	58.6	61.5	60.0	65.0
2009	n/a	n/a	n/a	n/a	n/a	100.0	100.0

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

FY 2010 Performance Results

We are able to report on performance in FY 2010 for the 2008 and 2009 cohorts of grants. The 2008 cohort fell slightly short of its target. No FY 2010 target was set for the FY 2009 cohort but we are reporting actual FY 2010 performance. There is incomplete data for the 2007 cohort and we are unable to report at this time, but will do so in 2011.

As we have received data from across cohorts for this measure, we continue to find it difficult to discern a pattern of performance that can serve as a basis for establishing future targets. For example, it is difficult to assess why performance results for the 2007 and 2008 cohorts fell short of the established targets for this measure in the past. Intensive technical assistance (via contract) services were not available to the FY 2008 cohort for much of FY 2009 but was in FY 2010. This might be one reason the FY 2008 cohort exceeded its FY 2009 performance, although slightly missed meeting the FY 2010 target.

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

We believe that an equally important dimension in assessing performance against established targets for this measure is our ability to correctly predict targets for measures. Because there is limited available research and no "industry" standard available to guide expectations for performance, generally we

have used the performance of prior cohorts on the measure to establish targets for subsequent cohorts. Because of the need to establish targets for future cohorts before a single cohort has completed project implementation and submitted final data, we have in the past based targets on information provided over a fairly limited amount of time, often reflecting the results of less than a single cohort of complete performance information.

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

Increasingly, it 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. Revised processes for establishing targets for this measure are discussed in the FY 2011 Performance Targets section below.

FY 2011 Performance Targets.

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 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 2008 and 2009 cohorts, these were set based on FY 2010 actual performance data.

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

ED does not mandate data collection protocols or instruments for grantees. Grantees select a survey item that reflects the concept of perceived harm to health, and collect and report data about that survey item as part of 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 of one percent or greater in the percentage of target students who perceive alcohol abuse is harmful to their health as having achieved a measurable increase for this measure.

Initially, applicants were not required to furnish baseline data as part of their applications. Data supplied after year one were considered baseline data for the projects. Projects required two years of data in order to determine if an increase in perceptions of alcohol abuse harm 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 13: The percentage of grantees that show a measurable increase in the percentage of target students who disapprove of alcohol abuse. (Grants to Reduce Alcohol Abuse – FY 2005, 2007, 2008, and 2009 cohorts – no new grants were awarded under this program in FY 2006.)

Table 13

Cohort	FY 2006 Actual	FY 2007 Actual	FY 2008 Actual	FY 2009 Actual	FY 2010 Target	FY 2010 Actual	FY 2011 Target
2005	n/a	71.0	74.1	n/a	n/a	n/a	n/a
2007	n/a	n/a	69.2	47.0	49.4	n/a	n/a
2008	n/a	n/a	n/a	49.3	51.8	58.3	65.0
2009	n/a	n/a	n/a	n/a	n/a	100.0	100.0

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. Data do suggest that increases in the percentage of target students who believe that alcohol abuse is not socially acceptable are associated with declines in consumption of alcohol.

FY 2010 Performance Results

We are able to report on performance in FY 2010 for the 2008 and 2009 cohorts of grants. The 2008 cohort exceeded its target. No FY 2010 target was set for the FY 2009 cohort but we are reporting actual FY 2010 performance. There is incomplete data for the 2007 cohort and we are unable to report at this time, but will do so in 2011.

As we have received data from across cohorts for this measure, we continue to find it difficult to discern a pattern of performance that can serve as a basis for establishing future targets. For example, it is difficult to assess why performance results for the 2007 and 2008 cohorts fell short of the established targets for this measure in the past. Intensive technical assistance (via contract) services were not available to the FY 2008 cohort for much of FY 2009 but was in FY 2010. This might be one reason the FY 2008 cohort exceeded its target in FY 2010.

We have carefully considered performance reports submitted by grantees, as well as our experience in monitoring and providing technical assistance to grantees, and have identified some challenges that may have impeded grant performance. Some common problems include turnover in leadership (at the authorized representative or project director level) and challenges with collecting and reporting valid data about the measure. Another variable that might affect performance in sites is related to project design. For example, we're not certain

how to assess the likely impact of a site that is implementing a single research-based program versus sites that have adopted a more comprehensive strategy that includes a community-based intervention that complements school-based curricula. Finally, cohort size and composition varies from cohort to cohort. In some years funding for a large amount of new awards is available and in others only a handful of sites will receive grants. To the extent that our peer review results that are used to rank order applications and select grantees accurately predict project quality, the range of scores funded (and perhaps the range of project quality) varies from fiscal year to fiscal year.

We believe that an equally important dimension in assessing performance against established targets for this measure is our ability to correctly predict targets for measures. Because there is limited available research and no "industry" standard available to guide expectations for performance, generally we have used the performance of prior cohorts on the measure to establish targets for subsequent cohorts. Because of the need to establish targets for future cohorts before a single cohort has completed project implementation and submitted final data, we have in the past based targets on information provided over a fairly limited amount of time, often reflecting the results of less than a single cohort of complete performance information.

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

Increasingly, it 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. Revised processes for establishing targets for this measure are discussed in the FY 2011 Performance Targets section below.

FY 2011 Performance Targets.

We had established an FY 2009 target for the FY 2007 cohort based on the performance of prior cohorts in 2008. However, this cohort experienced a significant decline in performance in FY 2009. Based on lower than anticipated levels of performance for this measure, we revised the FY 2010 targets for both the FY 2007 and FY 2008 cohorts for this measure. The 2010 target for the FY 2007 cohort was reduced from 86.5 percent to 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 2008 and 2009 cohorts, these were set based on FY 2010 actual performance data.

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

ED does not mandate data collection protocols or instruments for grantees. Grantees select a survey item that reflects the concept of disapproval of alcohol abuse, and collect and report data about that survey item as part of 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 reporting disapproval of alcohol abuse of one percent or greater to have achieved a measurable increase for this measure.

Initially, applicants were not required to furnish baseline data as part of their applications. Data supplied after year one were considered baseline data for the projects. Projects required two years of data in order to determine if an increase in disapproval of alcohol abuse among target students has 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 and 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 2010 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 2010 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 2010 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 2010 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.



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF INSPECTOR GENERAL

AUDIT SERVICES

JAN 31 2011

MEMORANDUM

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

From: Keith West *Keith West*
Assistant Inspector General for Audit

Subject: Office of Inspector General's Independent Report on the U.S. Department of Education's *Performance Summary Report for Fiscal Year 2010*, dated January 19, 2011

Attached is our authentication of management's assertions contained in the U.S. Department of Education's *Performance Summary Report for Fiscal Year 2010*, dated January 19, 2011, as required by section 705(d) of the Office of National Drug Control Policy Reauthorization Act of 1998 (21 U.S.C. § 1704(d)).

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

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

Attachment



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF INSPECTOR GENERAL

AUDIT SERVICES

JAN 31 2011

Office of Inspector General's Independent Report on the U.S. Department of Education's
Performance Summary Report for Fiscal Year 2010, dated January 19, 2011

We have reviewed management's assertions contained in the accompanying *Performance Summary Report Fiscal Year 2010*, dated January 19, 2011 (Performance Summary Report). The U.S. Department of Education's management is responsible for the Performance Summary Report and the assertions contained therein.

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

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

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

A handwritten signature in blue ink that reads "Keith West".

Keith West
Assistant Inspector General for Audit