

#### UNITED STATES DEPARTMENT OF EDUCATION

#### OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

February 25, 2014

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 Accounting of Drug Control Funding and Performance Summary, 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 2013, 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,

David Esquith

Director, Office of Safe and Healthy Students

Enclosure #1: Department of Education Performance Summary Report for Fiscal Year 2013, February 25, 2014

Enclosure #2: Authentication letter from Patrick J. Howard, Assistant Inspector General for Audit Services, February 25, 2014

cc: Patrick J. Howard

# **Department of Education**



# Performance Summary Report Fiscal Year 2013

In Support of the

National Drug Control Strategy

February 25, 2014

## U.S. Department of Education

## Performance Summary Report for Fiscal Year 2013

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#### UNITED STATES DEPARTMENT OF EDUCATION

#### OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

February 18, 2014

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 Accounting of Drug Control Funding and Performance Summary, 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 January 18, 2013. This information covers the Safe and Drug-Free Schools and Communities program, which is the Drug Control Budget Decision Unit under which the 2013 budgetary resources for the Department of Education are displayed in the Fiscal Year 2014 National Drug Control Budget and Performance Summary.

Consistent with the instructions in the ONDCP Circular, please provide your authentication to me in writing and I will transmit it to ONDCP along with the enclosed Performance Summary Report. ONDCP requests these documents by February 25, 2014. Please do not hesitate to contact me if you have any questions about the enclosed information.

Sincerely,

David Esquith

Director, Office of Safe and Healthy Students

### FY 2013 Performance Summary Information

#### Safe and Supportive Schools

In FY 2010 the Department awarded the first round of awards under the Safe and Supportive Schools (S3) grant program. Awards were made to State educational agencies to support statewide measurement of, and targeted programmatic interventions to improve conditions for learning in order to help schools improve safety and reduce substance use. Projects had to take a systematic approach to improving conditions for learning in eligible schools through improved measurement systems that assess conditions for learning, including school safety, and the implementation of programmatic interventions at the school level that address problems identified by data.

**Measure 1:** Percentage of eligible schools implementing programmatic interventions funded by Safe and Supportive Schools that experience a decrease in the percentage of students who report current (30-day) alcohol use.

Table 1

Cohort		FY2010 Actual			FY2013 Target	FY2013 Actual	FY2014 Target
2010	n/a	n/a	n/a	58.0	60.9	73.9	77.6

<u>The Measure</u>. ED established several GPRA performance measures for assessing the effectiveness of Safe and Supportive Schools grants. Four measures were related to addressing the goals of the National Drug Control Strategy. This measure was one of the four selected for that purpose.

FY 2013 Performance Results. For the FY 2012 Performance Summary Report we noted, related to setting FY 2013 targets: "baseline data are currently not be available on which to set these performance targets. These targets will be set by May 2013 once baseline data are aggregated for the entire FY 2010 grant cohort." Thus, the FY 2012 actual performance data are being reported here for the first time, as well as the FY 2013 target set based on this baseline data. The FY 2013 actual percentage of eligible schools implementing programmatic interventions funded by Safe and Supportive Schools that experienced a decrease in the percentage of students who report current (30-day) alcohol use was 73.9 percent, exceeding the target set.

NOTE: The data from two grants in the FY 2010 cohort were excluded from both the FY 2012 and FY 2013 actual percentages, as those data were deemed invalid and not comparable to the data from the other grants in the cohort. Grantees were advised in the Safe and Supportive Schools GPRA guidance to include only schools that had fully implemented programmatic interventions with

fidelity. The data for the two grantees that were excluded included a significant number of schools that were at varying stages of program implementation and did not meet this criterion. The two grantees are receiving additional technical assistance related to performance data collection.

<u>FY 2014 Performance Targets.</u> The FY 2013 target was set based on a five percent increase over FY 2012 actual performance (the baseline), and the FY 2014 target set based on a five percent increase over the FY 2013 actual. These targets were set based on previous experience with related state grant programs at the Department focused on substance abuse prevention and school safety.

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

To receive funds after the initial year of a multiyear 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 signed the annual performance report and, in doing so, certified that to the best of the signer's knowledge and belief, all data in the performance report were true and correct and that the report fully disclosed all known weaknesses concerning the accuracy, reliability, and completeness of the data included. Generally, the Department relied on the certification concerning data supplied by grantees and did not conduct further reviews.

The National Center on Safe Supportive Learning Environments, the technical assistance contractor for the S3 grant program, provided training on data collection. They reviewed data submitted, and worked with grantees to seek clarifying information and provide technical assistance if grantees were having difficulty in collecting or reporting data for this measure.

For measures related to 30-day alcohol use, States calculated the percentage of eligible schools implementing programmatic interventions that experienced either an increase or decrease in the percentage of students who reported each behavior or experience between year 1 and year 3, and this became the basis for the formulation of the baseline (FY 2012 actual) on which subsequent targets were set.

**Measure 2:** Percentage of eligible schools implementing programmatic interventions funded by Safe and Supportive Schools that experience an increase in the percentage of students who report current (30-day) alcohol use.

Table 2

Cohort		FY2010 Actual		AVEL CHILDREN CONTROL	FY2013 Target		FY2014 Target
2010	n/a	n/a	n/a	37.0	35.1	22.6	21.5

<u>The Measure.</u> ED established several GPRA performance measures for assessing the effectiveness of Safe and Supportive Schools grants. Four measures were related to addressing the goals of the National Drug Control Strategy. This measure was one of the four selected for that purpose.

FY 2013 Performance Results. For the FY 2012 Performance Summary Report we noted, related to setting FY 2013 targets: "baseline data are currently not be available on which to set these performance targets. These targets will be set by May 2013 once baseline data are aggregated for the entire FY 2010 grant cohort." Thus the FY 2012 actual performance data is being reported here for the first time, as well as the FY 2013 target set based on this baseline data. The FY 2013 percentage of eligible schools implementing programmatic interventions funded by Safe and Supportive Schools that experienced an increase in the percentage of students who report current (30-day) alcohol use was 22.6 percent, exceeding the target set.

NOTE: The data from two grants in the FY 2010 cohort were excluded from both the FY 2012 and FY 2013 actual percentages, as those data were deemed invalid and not comparable to the data from the other grants in the cohort. Grantees were advised in the Safe and Supportive Schools GPRA guidance to include only schools that had fully implemented programmatic interventions with fidelity. The data for the two grantees that were excluded included a significant number of schools that were at varying stages of program implementation and did not meet this criterion. The two grantees are receiving additional technical assistance related to performance data collection.

FY 2014 Performance Targets. The FY 2013 target was set based on a five percent increase over FY 2012 actual performance (the baseline), and the FY 2014 target set based on a five percent increase over the FY 2013 actual. These targets were set based on previous experience with related state grant programs at the Department focused on substance abuse prevention and school safety.

Methodology. These measures constituted the Department's indicators of success for the Safe and Supportive Schools grant program. Consequently, we advised applicants for a grant under this program to give careful consideration to

these measures in conceptualizing the approach and evaluation for its proposed program. Each grantee was required to provide, in its annual performance and final reports, data about its progress in meeting these measures.

To receive funds after the initial year of a multiyear 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 signed the annual performance report and, in doing so, certified that to the best of the signer's knowledge and belief, all data in the performance report were true and correct and that the report fully disclosed all known weaknesses concerning the accuracy, reliability, and completeness of the data included. Generally, the Department relied on the certification concerning data supplied by grantees and did not conduct further reviews.

The National Center on Safe Supportive Learning Environments, the technical assistance contractor for the S3 grant program, provided training on data collection. They reviewed data submitted, and worked with grantees to seek clarifying information and provide technical assistance if grantees were having difficulty in collecting or reporting data for this measure.

For measures related to 30-day alcohol use, States calculated the percentage of eligible schools implementing programmatic interventions that experienced either an increase or decrease in the percentage of students who reported each behavior or experience between year 1 and year 3, and this became the basis for the formulation of the baseline (FY 2012 actual) on which subsequent targets were set.

**Measure 3:** Percentage of eligible schools implementing programmatic interventions funded by Safe and Supportive Schools that experience an improvement in their school safety score.

Table 3

Cohort	FY2009 Actual	FY2010 Actual	The state of the s	The state of the s	FY2013 Target	FY2013 Actual	FY2014 Target
2010	n/a	n/a	n/a	59.0	62.0	72.9	76.5

<u>The Measure.</u> ED established several GPRA performance measures for assessing the effectiveness of Safe and Supportive Schools grants. Four measures were related to addressing the goals of the National Drug Control Strategy. This measure was one of the four selected for that purpose.

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

FY 2013 Performance Results. For the FY 2012 Performance Summary Report we noted, related to setting FY 2013 targets: "baseline data are currently not be available on which to set these performance targets. These targets will be set by May 2013 once baseline data are aggregated for the entire FY 2010 grant cohort." Thus, the FY 2012 actual performance data are being reported here for the first time, as well as the FY 2013 target set based on this baseline data. The FY 2013 actual percentage of eligible schools implementing programmatic interventions funded by Safe and Supportive Schools that experienced an improvement in their school safety score was 72.9 percent, exceeding the target set.

NOTE: The data from two grants in the FY 2010 cohort were excluded from both the FY 2012 and FY 2013 actual percentages, as those data were deemed invalid and not comparable to the data from the other grants in the cohort. Grantees were advised in the Safe and Supportive Schools GPRA guidance to include only schools that had fully implemented programmatic interventions with fidelity. The data for the two grantees that were excluded included a significant number of schools that were at varying stages of program implementation and did not meet this criterion. The two grantees are receiving additional technical assistance related to performance data collection.

FY 2014 Performance Targets. The FY 2013 target was set based on a five percent increase over FY 2012 actual performance (the baseline), and the FY 2014 target set based on a five percent increase over the FY 2013 actual. These targets were set based on previous experience with related state grant programs at the Department focused on substance abuse prevention and school safety.

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

To receive funds after the initial year of a multiyear 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 signed the annual performance report and, in doing so, certified that to the best of the signer's knowledge and belief, all data in the performance report were true and correct and that the report

fully disclosed all known weaknesses concerning the accuracy, reliability, and completeness of the data included. Generally, the Department relied on the certification concerning data supplied by grantees and did not conduct further reviews.

The National Center on Safe Supportive Learning Environments, the technical assistance contractor for the S3 grant program, provided training on data collection. They reviewed data submitted, and worked with grantees to seek clarifying information and provide technical assistance if grantees were having difficulty in collecting or reporting data for this measure.

For measures related to school safety scores, the improvement or worsening of scores were calculated between the year 1 and Year 3, and this became the basis for the formulation of the baseline (FY 2012 actual) on which subsequent targets were set.

**Measure 4:** Percentage of eligible schools implementing programmatic interventions funded by Safe and Supportive Schools that experience a worsening in their school safety score.

Table 4

Cohort	and the second second second	and the second second	FY2011 Actual	- Andrews of the second second	FY2013 Target	The state of the s	FY2014 Target
2010	n/a	n/a	n/a	30.0	28.5	20.8	19.8

<u>The Measure.</u> ED established several GPRA performance measures for assessing the effectiveness of Safe and Supportive Schools grants. Four measures were related to addressing the goals of the National Drug Control Strategy. This measure was one of the four selected for that purpose.

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

FY 2013 Performance Results. For the FY 2012 Performance Summary Report we noted, related to setting FY 2013 targets: "baseline data are currently not be available on which to set these performance targets. These targets will be set by May 2013 once baseline data are aggregated for the entire FY 2010 grant cohort." Thus the FY 2012 actual performance data is being reported here for the first time, as well as the FY 2013 target set based on this baseline data. The FY 2013 actual percentage of eligible schools implementing programmatic interventions funded by Safe and Supportive Schools that experienced a worsening in their school safety score was 20.8 percent, exceeding the target set.

NOTE: The data from two grants in the FY 2010 cohort were excluded from both the FY 2012 and FY 2013 actual percentages, as those data were deemed invalid and not comparable to the data from the other grants in the cohort. Grantees were advised in the Safe and Supportive Schools GPRA guidance to include only schools that had fully implemented programmatic interventions with fidelity. The data for the two grantees that were excluded included a significant number of schools that were at varying stages of program implementation and did not meet this criterion. The two grantees are receiving additional technical assistance related to performance data collection.

FY 2014 Performance Targets. The FY 2013 target was set based on a five percent increase over FY 2012 actual performance (the baseline), and the FY 2014 target set based on a five percent increase over the FY 2013 actual. These targets were set based on previous experience with related state grant programs at the Department focused on substance abuse prevention and school safety.

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

To receive funds after the initial year of a multiyear 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 signed the annual performance report and, in doing so, certified that to the best of the signer's knowledge and belief, all data in the performance report were true and correct and that the report fully disclosed all known weaknesses concerning the accuracy, reliability, and completeness of the data included. Generally, the Department relied on the certification concerning data supplied by grantees and did not conduct further reviews.

The National Center on Safe Supportive Learning Environments, the technical assistance contractor for the S3 grant program, provided training on data collection. They reviewed data submitted, and worked with grantees to seek clarifying information and provide technical assistance if grantees were having difficulty in collecting or reporting data for this measure.

For measures related to school safety scores, the improvement or worsening of scores were calculated between the year 1 and Year 3, and this became the

basis for the formulation of the baseline (FY 2012 actual) on which subsequent targets were set.

#### 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 2006 cohort)

Table 5

Cohort	FY2009 Actual	The state of the s	A STATE OF THE PARTY OF THE PAR	FY2012 Actual	FY2013 Target	FY2013 Actual	The second second
2006	66.7	n/a	n/a	n/a	n/a	n/a	n/a

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

This measure, one of four for this initiative for the FY 2004, 2005, and 2006 grant cohorts, focused on one of the primary purposes of the initiative – reduced student drug use. This measure was directly related to the National Drug Control Strategy's goal of preventing drug use before it begins. Grantees selected and reported 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 were not common across grant sites but, rather, reflected priority drug use problems identified by sites.

FY 2013 Performance Results. FY 2013 targets were not set, nor actual performance data aggregated for any grant cohorts, as grant projects were no longer active.

FY 2014 Performance Targets. The 2006 grant cohort was not operating after FY 2012. Thus, no targets were set for FY 2014.

Methodology. Data for these grant cohorts were collected by grantees, generally using student surveys. Data were furnished in the second of two semi-annual performance reports provided by grantees each project year. If grantees identified more than one measure of drug abuse or provided data for individual school-building types (for example, separate data for middle and high schools), grantees were considered to have experienced a decrease in substance abuse if data for a majority of measures provided reflected a decrease. If a grant site provided data for an even number of measures and half of those measures reflected a decrease and half reflected no change or an increase, that grant site was judged not to have demonstrated a decrease in substance abuse. While

most sites were able to provide some data related to this measure, we considered as valid data only data from sites that used the same elements/items in each of two years. We considered a grant site to have experienced a decrease if data supplied reflected a decrease over baseline data provided.

The contractor for the SS/HS national evaluation used data for this measure as part of the program evaluation. The evaluation contractor reviewed data submitted, and worked with grantees to seek clarifying information and provide technical assistance if grantees were having difficulty in collecting or reporting data for this measure.

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

Measure 2: The percentage of SS/HS grantees that report a decrease in students who report current (30-day) marijuana use (SS/HS – FY 2007, 2008, and 2009 cohorts)

Table 6

Cohort	FY2009 Actual	FY2010 Actual	FY2011 Actual	FY2012 Actual	FY2013 Target	FY2013 Actual	FY2014 Target
2007	42.9	37.5	51.9	n/a	n/a	n/a	n/a
2008	50.0	43.6	58.3	45.6	n/a	n/a	n/a
2009	n/a	0	55.2	55.1	58.4	65.4	n/a

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

This measure, one of six for this initiative for cohorts from FY 2007 - 2009, and a revision of the measure used by previous cohorts of grants, 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 reducing illicit drug use.

FY 2009 was the last cohort of new grants made under the program and, as the grants were for a four-year project period, the FY 2009 cohort's last year of continuation funding was made in FY 2012. FY 2012 was the last year of performance data submitted for the FY 2008 cohort. FY 2013 was the last year of performance data submitted for the FY 2009 cohort.

<u>FY 2013 Performance Results.</u> For the FY 2009 grant cohort, FY 2013 actual performance data have been aggregated, and are reported in Table 6. The FY 2007 and FY 2008 cohorts of grantees projects ended prior to FY 2013, and thus no FY 2013 data are reported. The FY 2009 cohort exceeded its FY 2013 target set.

Analysis of survey data in the 2013 "Monitoring the Future national survey results on drug use, 1975-2012. Volume I: Secondary school students" confirmed an ongoing reversal of previous year declines in 30-day prevalence of use of marijuana, with use by 12th grade students increasing from 19.4 percent in 2008 to 22.9 percent in 2012, and with use by 10th grade students increasing from 13.8 percent in 2008 to 17.0 percent in 2012. Thus, to some extent, the increase in the percentage of SS/HS grantees that reported a decrease in students who report current (30-day) marijuana use was at odds with national trends over the same period, and possibly could be attributed to the SS/HS programmatic interventions.

<u>FY 2014 Performance Targets.</u> Performance targets will not be set for FY 2014 as most grantees are completing unfinished grant activities in a no-cost extension period, with varying project period lengths and differing project scope and objectives.

<u>Methodology.</u> Data were 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 used data for this measure and from these cohorts as part of the national program evaluation. Through the FY 2011 data collection, the evaluation contractor reviewed performance data submitted by grantees, and worked with grantees to seek clarifying information and provided technical assistance if grantees were having difficulty in collecting or reporting data for this measure. The contractor supplied data for the measure after it had completed data cleaning processes.

In FY 2013, ED/HHS staff compiled and aggregated performance data from annual performance reports submitted by grantees. If data for this measure were

not available at the time that performance reports were submitted, staff followedup with sites to attempt to obtain data for the measure.

Grantees that failed to provide data or that provided 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 7

Cohort	FY2009 Actual	FY2010 Actual	FY2011 Actual	FY2012 Actual	FY2013 Target	FY2013 Actual	FY2014 Target
2007	47.8	66.7	70.4	n/a	n/a	n/a	n/a
2008	56.0	60.0	75.0	63.1	n/a	n/a	n/a
2009	n/a	0	58.6	65.5	69.4	69.2	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 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 the 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.

FY 2009 was the last cohort of new grants made under the program and, as the grants were for a four-year project period, the FY 2009 cohort's last year of continuation funding was made in FY 2012. FY 2012 was the last year of performance data submitted for the FY 2008 cohort. FY 2013 was the last year of performance data submitted for the FY 2009 cohort.

FY 2013 Performance Results. For the FY 2009 grant cohort, FY 2013 actual performance data have been aggregated, and are reported in Table 7. The FY 2007 and FY 2008 cohort of grantees projects ended prior to FY 2013, and thus no FY 2013 data are reported. For the FY 2009 cohort, there was an increase in the percentage of grantees that made progress related to this measure compared to the FY 2012 actual performance, and the FY 2013 target was almost met.

Analysis of survey data in the 2013 "Monitoring the Future national survey results on drug use, 1975-2012. Volume I: Secondary school students" noted that long-term evidence indicates that alcohol use moves much more in concert with illicit drug use than counter to it. However, from 2007 to 2011 alcohol use among high and college students continued its long-term decline, reaching an historic low in the life of the study, while marijuana use was rising. 2012 was a departure from this trend with 30-day alcohol use rising in all groups, except 8<sup>th</sup> graders, with a 4.2 percentage point increase among college students that was significant.

<u>FY 2014 Performance Targets.</u> Performance targets will not be set for FY 2014 as most grantees are completing unfinished grant activities in a no-cost extension period, with varying project period lengths and differing project scope and objectives.

<u>Methodology.</u> 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 used data for this measure and from these cohorts as part of the national program evaluation. Through the FY 2011 data collection, the evaluation contractor reviewed performance data submitted by grantees, and worked with grantees to seek clarifying information and provided technical assistance if grantees were having difficulty in collecting or reporting data for this measure. The contractor supplied data for the measure after it had completed data cleaning processes.

In FY 2013, ED/HHS staff compiled and aggregated performance data from annual performance reports submitted by grantees. If data for this measure were not available at the time that performance reports were submitted, staff followed-up with sites to attempt to obtain data for the measure.

Grantees that failed to provide data or that provided 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.

#### Grants to Reduce Alcohol Abuse

**Measure 1:** The percentage of grantees whose target students show a measurable decrease in binge drinking. (Grants to Reduce Alcohol Abuse Program – FY 2007, 2008, 2009, and 2010 cohorts)

Table 8

Cohort	FY2009 Actual	FY2010 Actual	FY2011 Actual	FY2012 Actual	FY2013 Target	FY2013 Actual	FY2014 Target
2007	47.0	83.0	n/a	n/a	n/a	n/a	n/a
2008	50.7	64.0	40.3	n/a	n/a	n/a	n/a
2009	n/a	57.1	67.0	75.0	n/a	n/a	n/a
2010	n/a	n/a	50.0	75.0	n/a	n/a	n/a

<u>The measure</u>. This measure examines a key outcome for the Grants to Reduce Alcohol Abuse (GRAA) program – reduction in binge drinking for the target student population. Research suggests that early use of alcohol is more likely to result in heavy later use of alcohol.

New grant awards were last made in FY 2010. Funds were not appropriated in FY 2012 for new or continuation awards and, as a result, the FY 2010 cohort of grantees was not provided their FY 2012 year 3 continuation award.

<u>FY 2013 Performance Results.</u> For the FY 2012 Performance Summary Report, the FY 2009 cohort performance data had not been aggregated due to the large number of grantees in no-cost extensions; the FY 2012 actual performance data are being reported here for the first time.

FY 2013 targets were not set, nor actual performance data aggregated for any grant cohorts, as grant projects were no longer active.

As we have received data from across cohorts for this measure and for this program, we continue to find it difficult to discern a pattern of performance that can serve as a basis for establishing future targets. We have carefully considered performance reports submitted by grantees, as well as our experience in monitoring and providing technical assistance to grantees, and have identified some challenges that may have impeded grant performance. Some common problems include turnover in leadership (at the authorized representative or project director level) and challenges with collecting and reporting valid data about the measure.

Another variable that might affect performance in sites is related to project design. For example, we are uncertain how to assess the likely impact of a site that is implementing a single research-based program versus sites that have adopted a more comprehensive strategy that includes a community-based intervention that complements school-based curricula. Finally, cohort size and composition varies from cohort to cohort. In some years funding for a large amount of new awards was available and in others only a handful of sites received grants, as was the case in FY 2010 with a cohort of 8 grants.

Increasingly, over time, it became clear that a series of variables serve to make each cohort unique, and that the issue of how we established targets for this measure in the past was problematic. Given these challenges, and improvements we 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 have provided some insights about general patterns of performance that we could incorporate into our targeting setting processes, we ultimately decided to establish numerical performance targets after baseline data is received for the new cohorts. We generally entered these targets for new grant cohorts into the Department's Visual Performance System (VPS) as "administrative" targets (for example, baseline plus 5 percent), and then converted the targets to numerical targets after baseline data is collected and aggregated. We believed that this process revision helped us better match targets to cohort performance.

FY 2014 Performance Targets. Targets have not been set for any grant cohorts as none will be active during FY 2014.

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 were able to report on grantee and cohort performance at the end of year one.

We have provided significantly increased guidance and technical assistance to grantees beginning with the FY 2007 cohort, and believe that these efforts have produced data that are of higher quality and more comparable across sites than those of previous cohorts.

**Measure 2**: The percentage of grantees that show a measurable increase in the percentage of target students who believe that alcohol abuse is harmful to their health. (Grants to Reduce Alcohol Abuse – FY 2007, 2008, 2009, and 2010 cohorts)

Table 9

Cohort	FY 2009 Actual	FY 2010 Actual	FY 2011 Actual	FY 2012 Actual	FY 2013 Target	FY 2013 Actual	FY 2014 Target
2007	76.5	88.9	n/a	n/a	n/a	n/a	n/a
2008	58.6	60.0	75.8	n/a	n/a	n/a	n/a
2009	n/a	100.0	67.0	62.5	n/a	n/a	n/a
2010	n/a	n/a	50.0	50.0	n/a	n/a	n/a

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

New grant awards were last made in FY 2010. Funds were not appropriated in FY 2012 for new or continuation awards and, as a result, the FY 2010 cohort of grantees were not provided their FY 2012 year 3 continuation award.

<u>FY 2013 Performance Results.</u> For the FY 2012 Performance Summary Report, the FY 2009 cohort performance data had not been aggregated due to the large number of grantees in no-cost extensions; the FY 2012 actual performance data are being reported here for the first time.

FY 2013 targets were not set, nor actual performance data aggregated for any grant cohorts, as grant projects were no longer active.

As we have received data from across cohorts for this measure and for this program, we continue to find it difficult to discern a pattern of performance that can serve as a basis for establishing future targets. We have carefully considered performance reports submitted by grantees, as well as our experience in monitoring and providing technical assistance to grantees, and have identified some challenges that may have impeded grant performance. Some common problems include turnover in leadership (at the authorized representative or project director level) and challenges with collecting and reporting valid data about the measure.

Another variable that might affect performance in sites is related to project design. For example, we are uncertain how to assess the likely impact of a site that is implementing a single research-based program versus sites that have adopted a more comprehensive strategy that includes a community-based intervention that complements school-based curricula. Finally, cohort size and composition varies from cohort to cohort. In some years funding for a large amount of new awards was available and in others only a handful of sites received grants, as was the case in FY 2010 with a cohort of 8 grants.

Increasingly, over time, it became clear that a series of variables serve to make each cohort unique, and that the issue of how we established targets for this measure in the past was problematic. 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 have provided some insights about general patterns of performance that we could incorporate into our targeting setting processes, we ultimately decided to establish numerical performance targets after baseline data is received for the new cohorts. We generally entered these targets for new grant cohorts into the Department's Visual Performance System (VPS) as "administrative" targets (for example, baseline plus 5 percent), and then converted the targets to numerical targets after baseline data is collected and

aggregated. We believed that this process revision helped us better match targets to cohort performance.

FY 2014 Performance Targets. Targets have not been set for any grant cohorts as none will be active during FY 2014.

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 student perceptions of harm 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 perceptions of harm, and collect and report data about that survey item as part of their performance reports. As a result, data are not comparable across grant sites, but individual grant sites are required to use the same survey items across performance periods. We consider sites that have experienced an increase in the percentage of students who believe alcohol abuse is harmful of one percent or greater to have achieved a measurable increase for the measure.

Initially, applicants were not required to furnish baseline data as part of their applications. Data supplied after year one were considered baseline data for the projects. Projects required two years of data in order to determine if an increase in perceptions of harm 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 were able to report on grantee and cohort performance at the end of year one.

We have provided significantly increased guidance and technical assistance to grantees beginning with the FY 2007 cohort, and believe that these efforts have produced data that are of higher quality and more comparable across sites than those of previous cohorts.

**Measure 3**: The percentage of grantees that show a measurable increase in the percentage of target students who disapprove of alcohol abuse. (Grants to Reduce Alcohol Abuse – 2007, 2008, 2009, and 2010 cohorts)

Table 10

Cohort	FY 2009 Actual	FY 2010 Actual	FY 2011 Actual	FY 2012 Actual	FY 2013 Target	FY 2013 Actual	FY 2014 Target
2007	47.0	88.9	n/a	n/a	n/a	n/a	n/a
2008	49.3	58.3	72.6	n/a	n/a	n/a	n/a
2009	n/a	100.0	67.0	75.0	n/a	n/a	n/a
2010	n/a	n/a	66.7	100.0	n/a	n/a	n/a

The measure. This measure examines a key outcome for the Grants to Reduce Alcohol Abuse (GRAA) program – disapproval of alcohol abuse among target students. While the National Drug Control Strategy is focused most intensively on the preventing the use of controlled substances, the strategy does address the role of alcohol use as a drug of choice for teenagers. Research does suggest that increases in the percentage of target students who believe that alcohol abuse is not socially acceptable are associated with declines in consumption of alcohol. New awards were last made in FY 2010. Funds were not appropriated in FY 2012 for new or continuation awards.

<u>FY 2013 Performance Results.</u> For the FY 2012 Performance Summary Report, the FY 2009 cohort performance data had not been aggregated due to the large number of grantees in no-cost extensions; the FY 2012 actual performance data are being reported here for the first time.

FY 2013 targets were not set, nor actual performance data aggregated for any grant cohorts, as grant projects were no longer active.

As we have received data from across cohorts for this measure and for this program, we continue to find it difficult to discern a pattern of performance that can serve as a basis for establishing future targets. We have carefully considered performance reports submitted by grantees, as well as our experience in monitoring and providing technical assistance to grantees, and have identified some challenges that may have impeded grant performance. Some common problems include turnover in leadership (at the authorized representative or project director level) and challenges with collecting and reporting valid data about the measure.

Another variable that might affect performance in sites is related to project design. For example, we are uncertain how to assess the likely impact of a site that is implementing a single research-based program versus sites that have adopted a more comprehensive strategy that includes a community-based

intervention that complements school-based curricula. Finally, cohort size and composition varies from cohort to cohort. In some years funding for a large amount of new awards was available and in others only a handful of sites received grants, as was the case in FY 2010 with a cohort of 8 grants.

Increasingly, over time, it became clear that a series of variables serve to make each cohort unique, and that the issue of how we established targets for this measure in the past was problematic. 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 have provided some insights about general patterns of performance that we could incorporate into our targeting setting processes, we ultimately decided to establish numerical performance targets after baseline data is received for the new cohorts. We generally entered these targets for new grant cohorts into the Department's Visual Performance System (VPS) as "administrative" targets (for example, baseline plus 5 percent), and then converted the targets to numerical targets after baseline data is collected and aggregated. We believed that this process revision helped us better match targets to cohort performance.

FY 2014 Performance Targets. Targets have not been set for any grant cohorts as none will be active during FY 2014.

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 students disapproving 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 who disapprove of alcohol abuse of one percent or greater to have achieved a measurable increase for the measure.

Initially, applicants were not required to furnish baseline data as part of their applications. Data supplied after year one were considered baseline data for the projects. Projects required two years of data in order to determine if an increase in disapproval of alcohol abuse 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 were able to report on grantee and cohort performance at the end of year one.

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.

#### Student Drug Testing

Measure 1: The percentage of student drug testing grantees that experience a 5 percent reduction in current (30-day) illegal drug use by students in the target population. (Student Drug Testing – FY 2006, 2007, and 2008 cohorts)

Table 11

Cohort	FY2009 Actual	FY2010 Actual	FY 2011 Actual	FY2012 Actual	FY2013 Target	FY2013 Actual	FY2014 Target
2006	12.5	57.0	n/a	n/a	n/a	n/a	n/a
2007	41.7	50.0	n/a	n/a	n/a	n/a	n/a
2008	49.0	65.0	35.5	n/a	n/a	n/a	n/a

The measure. This measure was 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.

Student drug testing was prominently featured between FY 2003 to 2009 in different versions of the National Drug Control Strategy as a recommended drug prevention intervention.

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

FY 2013 Performance Results. FY 2013 targets were not set, nor actual performance data aggregated for any grant cohorts, as grant projects were no longer active.

<u>FY 2014 Performance Targets.</u> No FY 2014 targets are applicable. FY 2011 was the last year of performance reporting of any of the Student Drug Testing grantees.

Methodology. Data for the FY 2006 cohort came from the evaluation conducted by a Department of Education contractor and were collected annually. Data for subsequent cohorts were collected by grantees using student surveys, and provided as part of the grantees' annual performance reports. Generally, grantees prior to FY 2008 cohort did not use the same survey items to collect data for this measure but, rather, self-selected survey items (often from surveys already administered) in order to provide these data. Beginning with the FY 2008 cohort, we asked grantees to provide data for current (prior 30-day) use of marijuana, as a proxy for illegal drug use. Beginning with the FY 2008 cohort, we also instructed grantees to collect baseline data for this measure before beginning with implementation of their student drug testing program.

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

**Measure 2**: The percentage of student drug testing grantees that experience a 5 percent reduction in past-year illegal drug use by students in the target population. (Student Drug Testing – FY 2006, 2007, and 2008 cohorts)

Table 12

Cohort	FY2009 Actual	FY2010 Actual	FY2011 Actual	FY2012 Actual	FY2013 Target	FY2013 Actual	FY2014 Target
2006	12.5	57.0	n/a	n/a	n/a	n/a	n/a
2007	33.3	54.0	n/a	n/a	n/a	n/a	n/a
2008	58.0	58.0	37.7	n/a	n/a	n/a	n/a

The measure. This measure was 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.

Student drug testing was prominently featured in annual editions of the National Drug Control Strategy between 2003 and 2009 as a recommended drug prevention intervention.

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

<u>FY 2013 Performance Results.</u> FY 2013 targets were not set, nor actual performance data aggregated for any grant cohorts, as grant projects were no longer active.

<u>FY 2014 Performance Targets.</u> No FY 2014 targets are applicable. FY 2011 was the last year of performance reporting of any of the Student Drug Testing grantees.

Methodology. Data for the FY 2006 cohort came from the evaluation conducted by a Department of Education contractor and were collected annually. Data for subsequent cohorts were collected by grantees using student surveys, and provided as part of the grantees' annual performance reports. Generally, grantees prior to FY 2008 cohort did not use the same survey items to collect data for this measure but, rather, self-select survey items (often from surveys already administered) in order to provide these data. Beginning with the FY 2008 cohort, we asked grantees to provide data for 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.

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

#### 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 2013 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 2013 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 2013 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 2013 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, as amended.



#### UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF INSPECTOR GENERAL

AUDIT SERVICES

February 25, 2014

#### Memorandum

TO:

David Esquith

Director, Office of Safe and Healthy Students Office of Elementary and Secondary Education

FROM:

Patrick J. Howard /s/

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 2013, dated

February 25, 2014

Attached is our authentication of management's assertions contained in the U.S. Department of Education's *Performance Summary Report for Fiscal Year 2013*, dated February 25, 2014, 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: Accounting of Drug Control Funding and Performance Summary, dated January 18, 2013.

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.



## UNITED STATES DEPARTMENT OF EDUCATION OFFICE OF INSPECTOR GENERAL

AUDIT SERVICES

Office of Inspector General's Independent Report on the U.S. Department of Education's Performance Summary Report for Fiscal Year 2013, dated February 25, 2014

We have reviewed management's assertions contained in the accompanying *Performance Summary Report for Fiscal Year 2013*, dated February 25, 2014 (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 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: Accounting of Drug Control Funding and Performance Summary, dated January 18, 2013.

Patrick J. Howard /s/ Assistant Inspector General for Audit