

Meeting Evidence Challenges Under PART: An Agency Perspective



Environmental Evaluators Networking Forum

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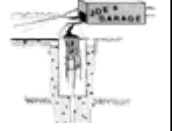







Office of Water, U.S. EPA

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PART Basics: Assessment Questions

Section	Purpose	Answer	Value
I. Program Purpose & Design	Assess whether the program design and purpose are clear and defensible	Yes, No, or Not Applicable	20%
II. Strategic Planning	Assess whether the agency sets valid annual and long-term goals for the program	Yes, No, or Not Applicable	10%
III. Program Management	Rate program management, including financial oversight and improvement efforts	Yes, No, or Not Applicable	20%
IV. Program Results	Rate program performance on goals reviewed in the strategic planning section and through other evaluations	Yes, Large Extent, Small Extent, or No	50%

Status of OW's PARTs

	Program	Years Evaluated	FY 06 PART Rating	FY 06 Budget
	Drinking Water State Revolving Fund	2002 / 03 / 04	Adequate	\$837 million
	Public Water Supply Systems	2004	Adequate	\$98 million
	Underground Injection Control	2004	Adequate	\$11 million
	Nonpoint Source	2002 / 03 / 04	Adequate	\$204 million
	Clean Water State Revolving Fund	2003/04	Adequate	\$887 million
	Mexico Border	2004	Adequate	\$49 million
	Tribal General Assistance Program	2002/2007	Moderately Effective	\$56 million
	Alaska Native Villages	2004/2006	Adequate	\$34 million
	Surface Water Protection	2005	Moderately Effective	\$189 million
	Pollution Control State Grants (106)	2005	Adequate	\$216 million
	Oceans & Coastal Protection	2005	Adequate	\$36 million
	Drinking Water Protection	2006	Adequate	\$98 million
	Chesapeake Bay Program	2006	Moderately Effective	\$ 22 million
	Great Lakes National Program	2007	Adequate	\$50 ³ million

Evidence Challenges



- **Question 1.4:** Is the program designed free of major flaws that would limit the program's effectiveness or efficiency?
- **Criteria:** “No strong evidence another approach would be more efficient or effective”
- **Challenge:** Objective/Independent studies on program design rarely exist
 - Agency's evidence vs OMB's opinion
- **Solution:** If flaws may exist but clear evidence is lacking, OMB should propose independent study on design.

Evidence Challenges



- **Question 2.5:** Do all partners...commit to and work toward the annual and/or long-term goals of the program?
- **Criteria:** “Partners measure and report on their performance as it relates to accomplishing program goals”
- **Challenge:**
 - Grant documents may reference PART goals but focus on others
 - Contractor SOW rarely include GPRA/PART measures
 - MOA’s/partnership agreements often do not include measures
- **Solution:**
 - Agencies need to reference GPRA/PART measures in partner agreements.
 - OMB needs to acknowledge legal and programmatic limitations of agency-grantee and contractor relationships

Evidence Challenges



- **Question 2.6:** Are independent evaluations of sufficient scope & quality conducted on a regular basis or as needed...?
- **Criteria:** “Evaluations must be “high quality, sufficient scope, unbiased, independent, and done regularly”
- **Challenge:** Criteria for evaluation is too restrictive. Under current resource limits, programs will never be able to meet criteria.
- **Solution:** OMB needs to re-evaluate its standards for evaluation & propose more realistic & effective criteria

Evidence Challenges

- **Question 2.7:** Are Budget request explicitly tied to accomplishment of....performance goals, & resource needs presented in transparent manner in budget?
- **Criteria:** Documentation of how budget request directly supports achieving performance targets
- **Challenge:**
 - Despite years of GPRA/PART, degree of budget/performance integration rarely exist at this level (“grant funding increased by x, would result in y outcomes”)
 - PART performance measures captured in Budget with explanations of impact of investments/disinvestments
 - Budget decisions reflect numerous inputs (CFOs, Congress, etc.)
- **Solution:** Agencies need to document performance-resource link.⁷

Evidence Challenges



- **Question 3.1:** Does agency collect timely/credible performance information...& use it to manage/improve performance?
- **Criteria:** “Program uses info to adjust program priorities, allocate resources, or take management actions”
- **Challenge:**
 - Programs rarely document connections between performance info & management decisions (e.g., grantee progress reports & changes in grant guidance)
- **Solution:** Agencies need to better document performance-based management decisions

Evidence Challenges



- **Question 3.2:** Are Federal managers and program partners held accountable for cost, schedule and performance results?
- **Criteria:** Program has specific performance standards & accountability for managers
- **Challenge:**
 - Real world examples of holding partners accountable are limited
- **Solution:** Agencies need to document on-going accountability practices

Evidence Challenges



- **Question 3.4/4.3:** Does program have procedures... to measure & achieve efficiencies & cost effectiveness...?
- **Criteria:** Program has regular procedures in place & can demonstrate improved efficiencies per annual \$
- **Challenge:** Programs have efficiency measures but often cannot document productivity gains per annual savings of practices/procedures
 - Many IT improvements result in undocumented dollar savings
- **Solution:** Programs need to do a better job of calculating cost/savings of management improvements

Evidence Challenges



- **Question 3.BF2/3.CO3:** Does program collect grantee performance data on an annual basis & make available to public in transparent & meaningful manner?
- **Criteria:** Grantee performance data available on web site aggregated at program level & disaggregated at grantee level
- **Challenge:**
 - Formula Grants: State-by-state performance data not available until recently
 - Competitive grants: Sheer number of grantees and project specific focus make annual reporting of performance data burdensome
- **Solution:** OMB needs to recognize reporting limitations of disaggregated performance data

Evidence Challenges



- **Question 4.1:** Has program demonstrated adequate progress in achieving long-term performance goals?
- **Criteria:** Either has met or are on track to meet long-term goals
- **Challenge:** Most program goals have not been around long enough to achieve long term targets (e.g., 2003 GPRA Plan: 2008 long term targets)
 - What historical data is needed to show “on track?”
- **Solution:** OMB needs to clarify what evidence is needed to demonstrate progress toward goals

Evidence Challenges



- **Question 4.4:** Does performance of program compare favorably to other programs...with similar purpose & goals?
- **Criteria:** Evaluations and/or data collected in systematic fashion that allow comparison of programs w/ similar purpose & goals
- **Challenge:** Comparative evaluations are rare and/or many regulatory programs have unique purpose
 - Not applicable is the best option for most programs
- **Solution:** OMB needs to re-consider the value of this question or find another way to assess “comparable” programs.

PART Evidence: Proposed Recommendations

- Agencies should make better efforts to document implementation decisions and processes.
 - Process evaluations would provide useful data to what extent policies & guidance are being implemented
- OMB should re-assess evidence criteria of PART guidance to reflect “real-world” legal and resource limitations
 - Form Agency-workgroup to re-assess PART guidance
 - Maintain that PART rating reflects program effectiveness, not simply availability of evidence