



PROGRAM ASSESSMENT RATING TOOL

PROGRESS EVALUATION





United States Department of the Interior

OFFICE OF INSPECTOR GENERAL

Office of Inspections and Evaluations

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FE 27 2008

Memorandum

To: Mary A. Bomar
Director, National Park Service

From: Donald W. Cairns *Christine M. Bruner*
Director, Program Analysis and Technical Support

Subject: Program Assessment Rating Tool (PART) — Progress Evaluation of the National Park Service (NPS) Land and Water Conservation Fund State Grants Program (Report No. Y-RR-NPS-0010-2007)

The Office of Inspector General recently had the opportunity to complete an independent progress evaluation of the Land and Water Conservation Fund State Grants Program (Program), which the Office of Management and Budget (OMB) assessed in 2003. Our team visited several field sites to learn about Program operations and spent time with a number of NPS employees. The team evaluated the progress your staff has made in addressing OMB's 2003 recommendations, and we thank the interviewees for their valuable input.

We found that Program officials are addressing many challenges, and we offer 12 suggestions that we believe will help you prepare for OMB's next review. We present a balance between 1) OMB expectations — as communicated in PART guidance and by the examiner — and 2) Program concerns — as communicated to us by NPS staff and selected contacts outside the agency. We encourage you to discuss these suggestions with your Deputy Director — Support Services and to implement those that you agree will improve Program performance and NPS's chances of a successful PART review in the future.

Please call me on 703-487-8011 if you have any comments or questions regarding this report.

cc: Assistant Secretary — Policy, Management and Budget

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Acronyms and Other Reference Terms

DOI	Department of the Interior
FRP	Farm and Ranch Land Protection
FY	Fiscal Year
GAO	Government Accountability Office
LWCF	Land and Water Conservation Fund
NHP	National Historic Preservation
NPS	National Park Service
OIG	Office of Inspector General
OMB	Office of Management and Budget
PART	Program Assessment Rating Tool
Program.....	Land and Water Conservation Fund Program
RND	Results Not Demonstrated
RWWGL	Rural Water and Wastewater Grants and Loans
SCORP	Statewide Comprehensive Outdoor Recreation Plan
States	States, the District of Columbia, and the United States Insular Areas of America Samoa, Guam, the Northern Mariana Islands, Puerto Rico, and the Virgin Islands
UPARR	Urban Parks and Recreation Recovery
USDA.....	U.S. Department of Agriculture

INTRODUCTION

WHY WE DID THIS PROGRESS EVALUATION

The Deputy Secretary of the Department of the Interior (DOI) asked the Office of Inspector General (OIG) to evaluate the progress made in programs designated **Results Not Demonstrated** (RND) by the Office of Management and Budget (OMB). OMB uses the PART to make these designations.

In consultation with officials in the DOI Offices of Budget and of Planning and Performance Management, we selected the Land and Water Conservation Fund (LWCF) State Grants Program (Program) for evaluation. We based the selection on a number of criteria, including the Program's budget and how long the Program has been in RND status.

OMB designated the Program RND in 2003 because the National Park Service (NPS) lacked adequate performance measures for the Program, failed to clearly demonstrate Program results, and had not taken meaningful steps to address the Program's management deficiencies.

OBJECTIVES AND METHODOLOGY

Our objectives were to determine what progress NPS has made toward implementing OMB's PART recommendations and to provide observations and suggestions that the Department and NPS can use in preparing for upcoming PART reviews.

To meet these objectives, we interviewed and conducted visits with DOI, NPS, and State-level officials (see Appendix B); reviewed and analyzed Program documentation; and completed a limited review of related literature in the fields of recreation planning, performance measurement, and grants management. We conducted our review in accordance with the "Quality Standards for Inspections" established by the President's Council on Integrity and Efficiency, and we based our suggestions on OMB's 2007 PART guidance.

What is the PART?

Federal agencies use the Program Assessment Rating Tool (PART), a standard questionnaire, to submit information on federal programs to OMB. OMB examiners assess programs based on responses to YES/NO questions in the areas of program purpose and design, strategic planning, program management, and — most importantly — program results.

OMB uses the information to determine program effectiveness, to recommend improvements for rated programs, and to follow up on those improvements.

The ExpectMore.gov Web site publishes PART results.

See Appendix A for more information on the history and use of the PART.

HOW WE STRUCTURED THIS REPORT

Following a brief Program overview, we discuss Program performance, reporting, and independent evaluation and offer 12 suggestions for Program improvement. Appendix C relates these topics to the PART questions for which the Program was unable to satisfy OMB requirements. Appendix D lists the suggestions detailed in this report.

PROGRAM OVERVIEW

The Land and Water Conservation Fund Act of 1965 established federal programs designed to strengthen the health and vitality of U.S. citizens by preserving and developing outdoor recreation resources. The Act supports federal land acquisition through both DOI and the U.S. Department of Agriculture. It also authorizes DOI to provide federal assistance grants to the 50 States, the District of Columbia, and 5 Insular Areas (the States). Each year, the Congress appropriates funds from the LWCF for apportionment to the States through the LWCF State Grants Program. Funding for the costs of Program administration is separately appropriated.

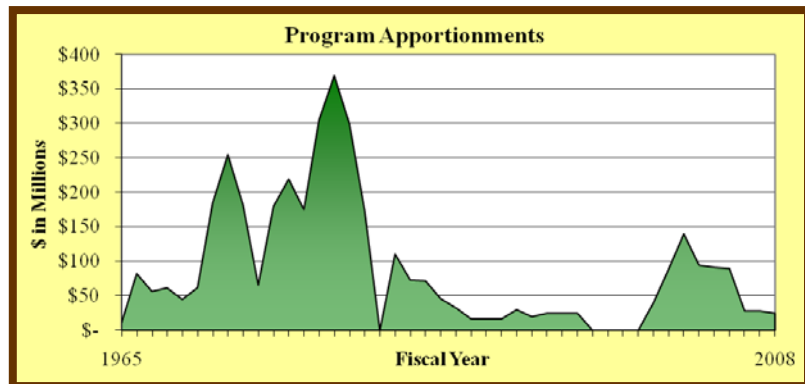


Program Logo

On behalf of the Secretary of the Interior, the NPS State and Local Assistance Division administers the Program. Through the Program, NPS provides matching grants to States and recognized Indian tribes for public outdoor recreation projects. NPS apportions grant monies to States using an established formula, with payments not to exceed 50 percent of the total cost of projects. These funds support planning, acquiring, and developing land and water recreational areas and related facilities. Sites acquired or developed with LWCF funds are preserved for public outdoor recreation in perpetuity.

Since its inception, the Program has contributed over \$3.7 billion — funding that has been matched with State and local contributions for a total investment of more than \$7.4 billion. Through fiscal year (FY) 2007, LWCF grants supported approximately 40,000 projects. Over 98 percent of these grants funded the acquisition of open space for State- and locally-operated parks and the development or redevelopment of outdoor recreation facilities. The remaining 2 percent of LWCF grants supported State and local planning efforts. As part of Program requirements, each State that applies for Program funds must submit a statewide comprehensive outdoor recreation plan (SCORP). The SCORP identifies investment priorities and provides a practical tool for coordinating State outdoor recreation and open space conservation programs. Through the SCORP development process, State-level officials provide local governments and private citizens the opportunity to take part in outdoor recreation planning.

Over the years, Program funding levels have fluctuated considerably, as shown in the graph below. In fact, several years passed in which no new grant monies were appropriated. Most recently, federal funding has declined from \$140 million in FY2002 to \$25 million in FY2008. This decrease is exacerbated by the discontinuance of grant funding for local parks and recreation agencies through a closely allied program for Urban Park and Recreation Recovery (UPARR). The UPARR Program had made available an average of \$12 million per year between FY1979 and FY2002, but the Congress has not appropriated any additional UPARR funds since then.



OIG graph based on data provided by NPS

A staff of 23 (full-time equivalent) employees administers the LWCF Program through a central office in Washington, DC, and four regional offices. This represents a staff reduction of about 30 percent over the last 2 years. These employees face further uncertainty because the Administration has not requested new grant funding for the Program.

The Congress has continued to appropriate some funds, however, and has also enacted the Gulf of Mexico Energy Security Act (GOMESA) to provide a long-term solution. GOMESA stipulates that certain oil and gas lease revenues be made available to the Program for apportionment to the States. Based on projections provided by officials from NPS and the Minerals Management Service, we understand that this funding will amount to an average of less than \$3 million per year through FY2017, after which funding levels are expected to rise significantly. It is clear, therefore, that without further appropriation the Program is poised to experience a temporary decline in funding over the next several years, a period to be followed by substantial growth.

OBSERVATIONS AND SUGGESTIONS

Based on its 2003 PART review, OMB made a number of recommendations to improve the Program. In the PART report, OMB called on NPS officials to 1) develop appropriate performance measures and targets, 2) establish more effective means of reporting performance information, and 3) institute independent evaluation of the Program. We learned that NPS has made some progress toward implementing these recommendations. In this report, we summarize key actions taken to date and offer suggestions to further strengthen Program management.

During our progress evaluation, we also came to understand that a significant breakdown in communications occurred between NPS officials and the OMB examiner after the original PART assessment. For example, the OMB examiner has indicated that NPS failed to provide sufficient detail relating to the Program's existing output and efficiency measures, such as definitions of

key terms and criteria for validating performance data. NPS officials indicated they have not received sufficient feedback from the OMB examiner on their proposals and perceived shortcomings.

In addition, there is a clear difference in perspectives regarding the role of Departmental officials as intermediaries in the communications process. Departmental officials do need to be kept abreast of issues as they are addressed, but we believe the PART review and ensuing performance improvement initiatives can succeed only if OMB and NPS officials accept their shared responsibility to maintain direct and open dialogue.

OIG Suggestion 1

Program officials should provide appropriate documentation to the assigned OMB examiner as improvement actions are implemented and discuss with that examiner the adequacy of the evidence provided. NPS, DOI, and OMB officials should then work with Program officials to collaboratively decide the next steps required to improve Program performance.

PERFORMANCE

OMB Recommendations

Coordinate with State partners to identify appropriate performance measures, consistent with the DOI strategic plan.

Implement new procedures to measure and achieve efficiencies in workload performance.

Work with States to establish baselines and set targets for performance measures.

For PART purposes, a complete set of performance measures would address:

- 1) **outcomes** — the external results and public benefits intended when carrying out program activities,
- 2) **outputs** — the products and services delivered by the program, and
- 3) **efficiency** — the economical management of resources to produce outputs and achieve outcomes.

NPS established a workgroup in 2004 that included NPS and State officials and a representative of the National Recreation and Park Association. The workgroup advised Program officials on how to respond to OMB's PART recommendations and focused on the development of performance goals and measures. The workgroup did not develop any measure that OMB considered an "outcome" measure. NPS officials have

adopted three output measures recommended by the workgroup. In addition, these officials have instituted an efficiency measure focused on the timeliness of grant application processing.

In this section, we discuss each of the three categories of performance measurement as they pertain to the LWCF Program. We also address the need for NPS officials to monitor Program results. In Table 2, on page 11, we summarize this discussion by showing the Program's existing measures and our suggested changes.

Outcome Measurement

OMB PART guidance requires the identification of key outcome measures for each federal program. NPS officials, however, have been unsuccessful in developing outcome measures acceptable to the OMB examiner for the LWCF Program.

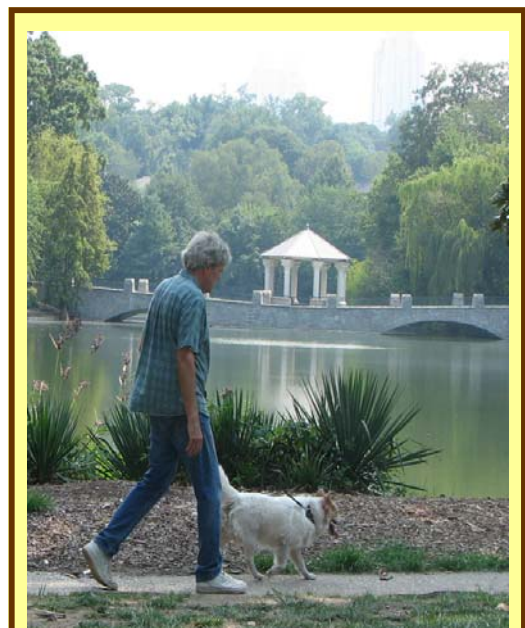
While the Program's ultimate purpose is to improve human health and vitality, the OMB examiner acknowledged that direct measurement of public wellness falls outside the purview of NPS. The OMB examiner expressed interest in alternative measures that track whether there is increased public use of outdoor recreation resources that the Program supports.

To explore this possibility, NPS management officials could consider requiring grant recipients to report visitation statistics. Visitation is an important measure for the National Park System. NPS reports that national parks were visited for recreation purposes an estimated quarter of a billion times every year since 1985. This number represents individual visits, with some people possibly visiting multiple parks or the same park multiple times.

However, implementing a reliable visitation measure Program-wide would require extensive validation, and we think it is unreasonable to expect NPS to replicate the approach outside the National Park System or to impose such a burden on local parks authorities. Studies that are limited in geographic scope and duration might provide useful insights as part of a broader evaluation strategy, but counting — or reliably estimating — the number of visitors to the tens of thousands of LWCF project sites nationwide would be unlikely to be cost-effective.

In an effort to identify other alternatives appropriate for the Program, we analyzed the outcome measures from three similar grant programs that received PART ratings from **Adequate** to **Effective**. See Appendix E for details of our analysis. We found that, for one of the grant programs, the performance measures focus on the total population served by the program, an idea that may be useful and meaningful to the LWCF Program.

Where direct measurement of program outcomes is not feasible, OMB's PART guidance allows for the acceptance of proxy measures, as long as there is a logical connection between the proxy and the end outcome or purpose of the program. According to the *American Journal of Preventive Medicine*, distance from home is closely associated with the likelihood of public use of open space, while several studies correlate park use to public health benefits. The



***Walking Trail in Piedmont Park
— Atlanta, Georgia —***

OIG Photo

number of people who reside within a specified distance of new LWCF projects could therefore serve as a proxy measure for public use of recreation resources. We depict the logical connection to the Program purpose in Table 1.

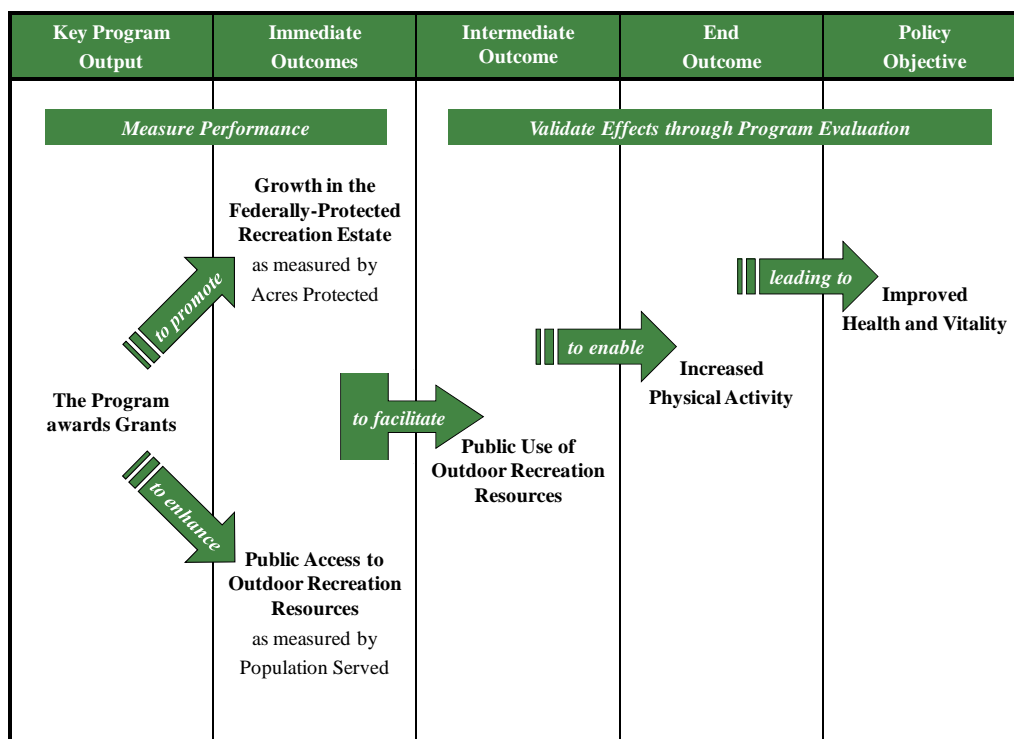


Table 1. Program Logic

OIG Staff

Program officials should be able to incorporate this population-served measure with relative ease because they already collect data that includes the geographic coordinates of each project site. With these coordinates, U.S. Census Bureau data on the urban and rural populations around each site (within the 50 states and the District of Columbia) are readily available. The data can be found using the Missouri Census Data Center’s “Circular Area Profiles” tool, which can be found online at <http://mcdc2.missouri.edu/websas/caps.html>.

To ensure consistent data, Program officials would need to —

- 1) select an appropriate radius, in miles;
- 2) determine whether grantees should provide figures from the latest decennial census or from the “American Community Survey,” which the U.S. Census Bureau uses to update its estimates;
- 3) develop a protocol to address the possibility of double-counting in the event that selected projects serve overlapping populations;
- 4) decide whether to exclude from the measures the five Insular Areas eligible for Program funding or to define other means by which these areas may be included; and
- 5) double-check a sample of the figures provided by grantees before aggregating data by State.

Measuring results based on population could drive State officials to concentrate Program investments in urban areas in order to maximize the apparent results. In some cases, this may be appropriate; however, there is a risk that more pressing needs in rural communities would thus be neglected. To reduce the risk of this unintended consequence, Program officials and their State-level counterparts should set separate targets for urban and rural population subsets.

OIG Suggestion 2

Program officials should use estimates of the total population within a specified radius of new LWCF project sites as a proxy for potential public use, setting separate targets for urban and rural population subsets.

Output Measurement

The Program's existing output measures focus on the preservation and development of outdoor recreation resources. However, these measures reflect the actions of grant recipients and not of NPS directly. The accomplishments are **external results** influenced by federal activity, and we therefore interpret these measures to be the **immediate outcomes** of the Program. We identified the potential **outputs** of the Program to be 1) SCORPs approved, 2) funds apportioned, 3) grants awarded, and 4) inspections completed, because these are the direct products of NPS activities. Of these, the key output is grants awarded— directly enabling Program beneficiaries to deliver the outcomes that the Program is designed to achieve.



***Land Acquired for Flo Ware Park
— Seattle, Washington —***

OIG Photo

One measure that Program officials currently report is the number of new acres protected each year (whether through acquisition, investment in development, or rehabilitation of facilities). This permanent federal protection of a national recreation estate distinguishes the LWCF Program from other State- or locally-funded efforts, and we believe the total area protected by the Program is as significant as its annual contribution. If Program officials were to implement a cumulative measure, they would need to be careful to avoid double-counting acres that have already been protected if new development or rehabilitation grants are subsequently awarded.

OIG Suggestion 3

Program officials should establish a long-term output measure of the total acreage protected since inception of the Program.

Program officials also currently report to OMB two measures related to the number of parks where development or rehabilitation projects have been funded. The OMB examiner has expressed some skepticism about these measures and the clarity of the underlying definitions and criteria. We agree that the use of unclear terminology can lead to misleading performance information. For example, the apparent number of parks could be increased administratively by simply designating different areas of a contiguous tract as separate park units — a county park adjacent to a town park, for instance. Arguably, this scenario would not directly contribute to improved public access, but would increase apparent results as measured by the number of parks.

To address this issue, we suggest supplementing these measures with a measure of the number of LWCF parkland *acres* enhanced. “Acre” is an easily understandable term with a standard meaning that would apply in any jurisdiction.

OIG Suggestion 4

Program officials should supplement existing measures of the number of parks enhanced to also report annual results in terms of acreage.

For those measures reported to OMB, State representatives set the FY2006 output targets. Program officials collected year-end data on actual accomplishments and reported the results to OMB. Therefore, officials from both OMB and NPS agree that the recommendation to work with States to establish baselines and set targets for performance measures is complete.

Due to the planning challenges associated with the fluctuation in yearly funding levels, however, NPS officials have discontinued the use of State-set targets. They have, instead, proposed national targets through FY2012. The OMB examiner indicated to us that performance targets could be tied to certain reasonable assumptions about future funding levels. One such assumption might be that recent appropriations levels will remain constant; another might be that no new funding will be appropriated, as proposed in the President’s recent budget requests. NPS officials should be prepared to adjust their planning assumptions and performance targets as the Congress takes action on bills affecting the Program.

OIG Suggestion 5

NPS officials should document the planning assumptions used to set performance targets and consult with the OMB examiner to determine whether the Program’s proposed targets are sufficiently ambitious to meet OMB’s PART expectations.

Efficiency Measurement

In addition to the output measures we discuss above, Program officials currently report to OMB on workload performance efficiency. Specifically, they identify how long it takes to process a grant application, from receipt to approval, as recorded in the Program database. OMB has accepted this measure for other grant programs that received successful PART ratings.

To help reduce application processing time, NPS created the “Proposal Description and Environmental Screening Form,” which incorporates federal requirements for grant applicants. Program officials say they have cut processing time by more than half since providing a baseline for the original PART review, and they anticipate sustaining this new level of performance (assuming a degree of stability in administrative funding and the number of grant applications received). NPS is also revising its grants manual to incorporate guidance to the States on how to properly complete a grant application.

OIG Suggestion 6

Program officials should provide the OMB examiner evidence that supports the performance baseline they asserted for timely processing of grant applications and of the efficiency gains achieved. Program officials should also share updated parts of the grants manual and the newly developed screening form with the OMB examiner.

Monitoring Program Results

Regardless of what performance measures are in place, managers of grant programs have a responsibility to monitor results. NPS officials, however, told us they no longer conduct reviews of State programs, including project inspections and file reviews. Program officials attribute the discontinuance to staffing and funding reductions.

NPS now relies on project inspections conducted by the States. NPS officials in some regions are also using aerial photography and county records. An ongoing imaging project enables NPS staff to determine whether development has occurred within the boundary lines of LWCF project sites and to verify or update records accordingly. Program officials report that imaging has been completed in at least one region.

NPS has developed an annual performance measure for the number of LWCF projects inspected and determined to be open for public, outdoor recreation use. Currently, the States conduct all of these inspections. We believe NPS officials should have responsibility for conducting at least a portion of the inspections and should clearly report the extent to which they fulfill this obligation. Supplementing the existing measure of projects inspected with a new measure of the percentage of inspections conducted by NPS would help the OMB examiner, and others, to track efforts to expand Program monitoring. If NPS were to re-institute its inspections, a cost efficiency measure could also be established to monitor the average cost per inspection.

We believe NPS needs to strengthen its monitoring and oversight of Program results. An effective monitoring strategy would involve completing the imaging projects for all regions, as well as combining State-certified inspection reports and NPS (or independent) inspections and records reviews. This would provide greater assurance that LWCF sites and facilities are protected and remain accessible for public recreation.

OIG Suggestion 7

NPS officials should strengthen Program monitoring and develop performance measures of the percentage of inspections conducted by NPS and of the average cost per inspection.

In addition to Program inspections, full implementation of a “maintenance-of-effort” requirement for the LWCF Program should provide assurance that Program funding is, indeed, expanding investment in outdoor recreation resources. Under a maintenance-of-effort agreement, grant recipients would commit to use grant funds to increase total spending on recreation and not to cut funding for recreation from other sources. A number of grant programs include such a requirement to ensure that grant recipients use federal funds for the intended purposes without offsetting the federal investment through other changes in spending. For example, the Community Mental Health Services grant program administered by the Department of Health and Human Services (and rated **Adequate** by OMB) requires that States maintain State funding for community mental health services at a level that is not less than the 2-year average.

The LWCF Program includes a general statement of intent in its Grants Manual that “...assistance granted from the Fund will result in a net increase . . . in a participant’s outdoor recreation...” and that the grant moneys “...will be added to, rather than replace or be substituted for, State and local outdoor recreation funds.” However, there is no specific criterion or funding formula on which to base enforcement. Therefore, we do not suggest a related performance measure at this time, but instead call for officials to consider whether a more stringent maintenance-of-effort requirement would improve Program accountability over the long term.

OIG Suggestion 8

DOI officials should consider strengthening the Program’s maintenance-of-effort requirement.

Summary of Suggested Performance Measures

Table 2 summarizes current performance measures developed and reported by NPS, as well as the changes that we suggest. These changes, if implemented, would provide a consistent unit of measurement (acreage) for Program outcomes, and shift the focus from the *methods* employed by Program beneficiaries (acquisition, development, rehabilitation) to the intended *results* (expansion of the LWCF estate, enhancement of acreage in the existing LWCF inventory). In the table, we interpret some of the Program’s existing output measures to instead be immediate outcomes of the Program’s key output — grants awarded — and suggest that they be reclassified accordingly.

Types of Measures	Current NPS Measures	Suggested Actions	OIG-Suggested Measures
Long-Term Outcome		<i>ADD NEW MEASURE</i>	Cumulative number of acres protected for public outdoor recreation use
Annual Outcome	Number of new acres protected	<i>RETAIN</i>	Number of new acres protected
		<i>ADD NEW MEASURE</i>	Number of existing LWCF acres enhanced
	Number of parks enhanced through development or rehabilitation	<i>RETAIN</i>	Number of parks enhanced through development or rehabilitation
	Number of parks where new outdoor recreation facilities were developed		Number of parks where new outdoor recreation facilities were developed
		<i>ADD NEW MEASURE</i>	Population served by new LWCF grants
Annual Output	Number of LWCF projects inspected and determined to be open for public outdoor recreation use	<i>RETAIN</i>	Number of LWCF projects inspected and determined to be open for public outdoor recreation use
		<i>ADD</i>	Percentage of inspections conducted by NPS
Annual Efficiency		<i>ADD NEW MEASURE</i>	Average unit cost per inspection conducted by NPS
	Average grant application processing time	<i>RETAIN</i>	Average grant application processing time

Table 2. Program Performance Measures

REPORTING

OMB Recommendations

Establish an effective reporting process to show national results.

Prepare an annual report that uses performance measures to show program results nationally and by State.

Following the 2003 OMB PART assessment, NPS officials began to publish an annual summary of Program accomplishments, including a series of project profiles to highlight LWCF-supported parks in a number of States. The report provides data on key Program outputs. NPS officials collect these data using the Program's newly revised "Description and Notification Form." This form serves as a key tool to standardize data collected from the States. Much of this information is reported only in terms of national totals in the annual report, while the NPS Web site includes data specific to each State and county.

Recent annual reports, though useful, do not include target information for the reported measures. Thus, the general reader is unable to tell whether the Program is achieving its goals.

OIG Suggestion 9

Program officials should validate performance targets each year, based on the level of funding approved. At the end of the year, Program officials should compare national results to these targets in the Program's annual report and discuss the reasons for any significant shortfalls.

In addition to output data, the annual reports provide an estimate of States' unmet needs, in monetary terms. Although SCORPs identify and prioritize outdoor recreation resource needs, the extent to which these plans are used in estimating each State's unmet needs is unclear. From year to year, figures reported to NPS for the annual report have fluctuated significantly and without explanation. In the 2006 report, 16 States more than doubled their estimate of unmet needs from the previous year.

OIG Suggestion 10

Program officials should work with State representatives to standardize the method for estimating unmet needs. The method should recognize the States' lead role in setting investment priorities and also satisfy OMB's interest in validating the need for continued federal funding.

The assessment of unmet needs is important because the LWCF Act requires that a significant percentage of the Program's funds be apportioned on the basis of need. In addition to publishing the States' estimates, the Program requires each State to evaluate demand for and supply of

outdoor recreation facilities in its SCORP. However, NPS does not use this information in apportioning discretionary funding. Instead, officials base the annual apportionment on total and urban population figures provided by the U.S. Census Bureau. Over time, improvements in needs assessment and performance reporting should provide a basis for more effective resource allocation.

OIG Suggestion 11

Program officials should consider States' needs and performance when apportioning discretionary funds.

INDEPENDENT EVALUATION

OMB Recommendation

Determine a process and schedule for an independent evaluation of the program.

OMB's 2007 PART guidance requires that independent evaluations be conducted on a regular basis, as appropriate to the needs and resources of specific programs. One approach to meet the requirement might be to contract for an evaluation that is Program-wide in scope and that broadly addresses the issue of overall effectiveness. In fact, the OMB examiner has indicated that an independent evaluation demonstrating Program effectiveness might help NPS avoid the anticipated

decline in Program funding. This presents a quandary for Program officials because they do not have the administrative funds to pay for such an endeavor.

An alternative approach would be to ask the Government Accountability Office (GAO) to fund and schedule a comprehensive one-time effort. While such an effort may be feasible, we note that a regular schedule of more focused efforts might also be used to satisfy evaluation requirements. OMB guidance requires examiners to consider not only the independence, scope, and quality of program evaluation, but also the frequency of evaluative efforts. A single evaluation will not fulfill this requirement unless it is coupled with credible plans to repeat the effort on a periodic basis or to support it with other evaluative efforts over time.

NPS could adapt one such focused effort, which is described in the National Park System Advisory Board report titled, "Health, Recreation, and Our National Parks — Addressing the Role of National Parks to Promote and Provide Healthful Recreational Opportunities: An Outcome-Based Approach." This report includes a proposal for a series of pilot projects at selected national parks to test and provide continued validation of the premise that parks contribute to healthy lifestyles. If NPS were to implement the proposal, it might be possible to expand the scope of the studies to include selected LWCF project sites as representative of community-based recreation opportunities. Such an endeavor could add to the existing body of knowledge that links the provision of recreation spaces to increased physical activity and

improved public health. At the same time, it could help NPS officials better understand and articulate the respective roles of national and community-based parks.

OIG Suggestion 12

NPS officials should a) pursue the possibility of a GAO review of the Program and b) explore opportunities to include LWCF-supported parks in studies of how well the National Park System contributes to the achievement of DOI's recreation objectives.

Independent evaluation — together with improved monitoring, more convincing needs assessment, and better performance information — should strengthen the Program's position in justifying its funding requests. It should also provide information useful for planning future Program investments.

APPENDIX A: HISTORY AND USE OF THE PART

Planning and performance monitoring are required by law. In 1993, the Congress found federal managers to be “disadvantaged in their efforts to improve program efficiency and effectiveness, because of insufficient articulation of program goals and inadequate information on program performance.” The Government Performance and Results Act (Public Law 103-62), or GPRA, was passed to promote a focus on results by requiring federal agencies to engage in strategic planning and performance reporting.

Objectives and results of federal programs are assessed during budget formulation. The “President’s Management Agenda,” which includes a U.S. Government-wide initiative to improve budget and performance integration, was published in 2001. The Agenda calls for agencies to monitor program performance and to incorporate performance review into budgetary decision-making.

To support this initiative, the Office of Management and Budget (OMB) instituted a new activity within the context of budget formulation. OMB uses a standard questionnaire called the Program Assessment Rating Tool (PART) to engage federal programs in a review of program design, strategic planning, program management, and the achievement of results that demonstrate value for the taxpayer. Through the PART process, OMB rates programs as Effective, Moderately Effective, Adequate, or Ineffective. Alternatively, OMB deems programs that are unable to provide reliable performance information (thus precluding assignment of a program rating) Results Not Demonstrated and recommends establishment or improvement of mechanisms for performance measurement.

OMB has found that many DOI programs lack performance information. Of the 72 Department of the Interior programs assessed between 2002 and 2007, OMB rated only eight programs (11 percent) Effective and placed 16 programs (22 percent) in the category Results Not Demonstrated.

PART Ratings for DOI Programs, 2002-2007	Number of Programs	Percent of Programs
Effective	8	11
Moderately Effective	23	32
Adequate	25	35
Ineffective	0	0
Results Not Demonstrated	16	22
TOTAL	72	100

Department of the Interior programs assessed through the PART process reflect over \$9 billion dollars in annual budget authority. Approximately one quarter of this spending is associated with programs that lack reliable performance information.

PART findings can be used to 1) justify termination or substantial curtailment of federal programs, 2) support legislative or fiscal enhancements, or 3) promote management improvements. OMB publishes PART results on its ExpectMore.gov Web site, together with recommended improvement actions for every program it has assessed. Agency officials and program managers are expected to follow up on these recommendations and to keep OMB, and ultimately the public, apprised of progress through updates of the information posted to ExpectMore.gov and through internal communications. OMB then reassesses programs on schedules developed in consultation with responsible agencies.

APPENDIX B: SITES VISITED OR CONTACTED

NPS or Departmental	
<i>National Park Service</i>	State and Local Assistance Division Washington, D.C. Strategic Planning Washington, D.C.
<i>Department of the Interior</i>	Planning and Performance Washington, D.C.
Project Visits	
<i>Alabama</i>	Various parks in the cities of Colony, Cullman, Decatur, Hartselle, and Priceville
<i>California</i>	McKinnley, William Land, and Discovery Parks in Sacramento
<i>Georgia</i>	Piedmont and Centennial Olympic Parks in Atlanta
<i>Idaho</i>	Barber, Baggley and Ivywild Parks in Boise
<i>Michigan</i>	South Westnedge Park in Portage, and Prairie View, Upjohn and Verberg River Parks in Kalamazoo
<i>Nevada</i>	Sand Harbor State Park in Lake Tahoe, Galena Creek Regional Park in Reno, and Incline Village Park in Incline Village
<i>Washington</i>	Flo Ware Park and Arboretum Waterfront Trail Development in Seattle, Seahurst Park in Burien, and Van Doren's Landing in Kent
Others Contacted	
States of Florida and Virginia U.S. Office of Management and Budget	
Other Visits	
National Recreation and Park Association Public Policy Washington, D.C.	

APPENDIX C: OMB PART QUESTIONS WITH “NO” ANSWERS AS THEY RELATE TO OUR OBSERVATIONS AND SUGGESTIONS

PART Questions with “NO” Answers	Subsection(s) in this Report
1.4 Is the program design free of major flaws that would limit the program’s effectiveness or efficiency?	Performance and Reporting
2.1 Does the program have a limited number of specific long-term performance measures that focus on outcomes and meaningfully reflect the purpose of the program?	
2.2 Does the program have ambitious targets and timeframes for its long-term measures?	
2.3 Does the program have a limited number of specific annual performance measures that demonstrate progress toward achieving the program's long-term measures?	Performance
2.4 Does the program have baselines and ambitious targets and timeframes for its annual measures?	
2.5 Do all partners (including grantees, sub-grantees, contractors, cost-sharing partners, etc.) commit to and work toward the annual and/or long-term goals of the program?	Performance and Reporting
2.6 Are independent and quality evaluations of sufficient scope and quality conducted on a regular basis or as needed to support program improvements and evaluate effectiveness and relevance to the problem, interest, or need?	Independent Evaluation
2.7 Are Budget requests explicitly tied to accomplishment of the annual and long-term performance goals, and are the resource needs presented in a complete and transparent manner in the program's budget?	Performance
2.8 Has the program taken meaningful steps to correct its strategic planning deficiencies?	
3.1 Does the agency regularly collect timely and credible performance information, including information from key program partners, and use it to manage the program and improve performance?	Reporting

PART Questions with “NO” Answers	Subsection(s) in this Report
3.2 Are Federal managers and program partners (grantees, subgrantees, contractors, cost-sharing partners, etc.) held accountable for cost, schedule and performance results?	Performance and Reporting
3.4 Does the program have procedures (e.g., competitive sourcing/cost comparisons, IT improvements, appropriate incentives) to measure and achieve efficiencies and cost effectiveness in program execution?	Performance
3.7 Has the program taken meaningful steps to address its management deficiencies?	Reporting
3.BF2. Does the program collect grantee performance data on an annual basis and make it available to the public in a transparent and meaningful manner?	
4.1 Has the program demonstrated adequate progress in achieving its long-term outcome performance goals?	Performance
4.2 Does the program (including program partners) achieve its annual performance goals?	

APPENDIX D:

TABLE OF SUGGESTIONS

Number	Suggestion	Page
Overall PART Process		
1	Program officials should provide appropriate documentation to the assigned OMB examiner as each improvement action is implemented and discuss with that examiner the adequacy of the evidence provided. NPS, DOI, and OMB officials should then work with Program officials to collaboratively decide the next steps required to improve Program performance.	4
Performance		
2	Program officials should use estimates of the total population within a specified radius of new LWCF project sites as a proxy for potential public use, setting separate targets for urban and rural population subsets.	7
3	Program officials should establish a long-term output measure of the total acreage protected since inception of the Program.	7
4	Program officials should supplement existing measures of the number of parks enhanced to also report annual results in terms of acreage.	8
5	NPS officials should document the planning assumptions used to set performance targets and consult with the OMB examiner to determine whether the Program's proposed targets are sufficiently ambitious to meet OMB's PART expectations.	8
6	Program officials should provide the OMB examiner evidence that supports the performance baseline they asserted for timely processing of grant applications and of the efficiency gains achieved. Program officials should also share updated parts of the grants manual and the newly developed screening form with the OMB examiner.	9
7	NPS officials should strengthen Program monitoring and develop performance measures of the percentage of inspections conducted by NPS and of the average cost per inspection..	9
8	DOI officials should consider strengthening the Program's maintenance-of-effort requirement.	10

Number	Suggestion	Page
Reporting		
9	Program officials should validate performance targets each year, based on the level of funding approved. At the end of the year, Program officials should compare national results to these targets in the Program's annual report and discuss the reasons for any significant shortfalls.	12
10	Program officials should work with State representatives to standardize the method for estimating unmet needs. The method should recognize the States' lead role in setting investment priorities and also satisfy OMB's interest in validating the need for continued federal funding.	12
11	Program officials should consider States' needs and performance when apportioning discretionary funds.	13
Independent Evaluation		
12	NPS officials should a) pursue the possibility of a GAO review of the Program and b) explore opportunities to include LWCF-supported parks in studies of how well the National Park System contributes to the achievement of DOI's recreation objectives.	14

APPENDIX E: BENCHMARKING OUTCOME MEASUREMENTS

In an effort to identify an appropriate outcome measure for the Program, we reviewed the PART measures from three similar grant programs. These programs received PART ratings ranging from **Adequate** to **Effective** and have outcome measures that have been accepted by OMB. The U.S. Department of Agriculture (USDA) administers two of the programs — the Farmland Protection Program (also known as the Farm and Ranch Land Protection Program, or FRP) and the Rural Water and Wastewater Grants and Loans (RWWGL) Program. NPS, itself, administers the National Historic Preservation (NHP) Program.

Through the FRP, the USDA offers federal assistance to State, tribal, and local governments and non-governmental organizations to acquire conservation easements to protect agricultural lands from conversion to other uses, particularly urban development. The long-term outcome measure for the FRP is the “Percent of FRP farms that remain in active agriculture”. To adopt this measure for use by the LWCF Program would entail reporting the “Percent of LWCF project sites that remain in outdoor recreational use”. However, given that such protection is mandatory under the LWCF Act, the target and results for such an outcome measure should always be 100 percent. This would not be useful to NPS in managing Program performance.

Through the NHP, the NPS works with inter-governmental partners to influence the decisions of private property owners to preserve historical properties of national significance. According to OMB, the performance measures for the NHP Program are “...keyed to the outcome of more historic properties protected outside the National Park System.” On the surface, this would seem to be analogous to the LWCF Program, with activities keyed to the outcome of more recreation properties protected outside the National Park System. However, the NHP Program targets private property, and fewer than 3 percent of NHP properties receive federal protection. Again, the federal protection automatically afforded under the LWCF Act renders meaningless an outcome measure of this protection.

Finally, through the RWWGL Program, the USDA seeks to reduce exposure to water-related health hazards. RWWGL officials have set a goal of serving 5 percent of the target population each year, to a cumulative long-term goal of serving about 15 million people. On the surface, this may not seem to be applicable to the LWCF Program, given that its target population is unrestricted — that is, the general citizenry are the intended beneficiaries. However, assessing the population served by the Program each year may in fact provide some indication of the Program’s ability to reach intended beneficiaries and, as stipulated in the DOI Strategic Plan, “Improve recreation opportunities for America”. Accordingly, we have included a related suggestion in the “Outcome Measurement” section of our report (see page 7).

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