

Verification and Validation of Performance Measures

During the past several years, the Department has addressed data reliability issues through internal reporting and tracking systems and other internal control mechanisms that provide for considerable bureau discretion. A variety of approaches have been developed to accommodate the particular needs of offices with widely varying missions.

In 2001, the Department began to develop a more direct approach—a data validation and verification "matrix" that has been tested at various organizational levels. The matrix is based on basic principles that are typically applied to technical data collection and auditing situations. The Department reviewed recent literature, such as the General Accounting Office (GAO) report on data validation and verification, participated in local data verification and validation conferences, reviewed agency plans, and conferred with federal organizations that have demonstrated leadership in the Government Performance and Results Act (GPRA) arena. The advice and perspectives of the Office of the Inspector General (OIG) and a number of field-level personnel were also solicited. The result is a set of criteria for data validation and a five-part set of criteria for data verification applicable to GPRA goals.

Data validation criteria address central questions concerning the appropriateness of a goal relative to an organization's mission, and whether a goal is measurable, realistic, understandable, pertinent to decisionmaking, and reflective of the activity being measured.

Data verification centers on five critical areas: data standards and procedures, data handling, data quality, data integrity, and oversight mechanisms. Each area includes an individual set of core criteria for evaluating the strengths and weaknesses of that specific aspect of data verification.

The basic philosophy underlying the data verification and validation approach is to establish clear expectations and requirements that have been ground-tested for practicality and reasonableness so that organizations are positioned to succeed rather than fail for lack of direction. An allied concern is that data verification and validation will be viewed as another GPRA reporting burden instead of as an integral component of any business plan. The incremental approach affords time for exercising leadership, changing organizational culture, refining processes, and establishing clear accountability. It avoids imposing a large front-end reporting burden that could meet with resistance and might end up significantly impacting other mission priorities at a time when workforce levels are expected to decline and process improvement benefits may not be fully realized.

The Department pilot tested the matrix concept for data verification and validation beginning in the summer of 2001; pilot tests concluded in the fall. At that point, test results and related observations and recommendations were evaluated by a working group consisting of departmental and bureau planners and analysts. In late December the working group met to begin refining the matrix system and to explore the manner in which implementation would occur. The group will bring final revisions and recommendations to a close-out meeting scheduled for mid-March, 2002. Recommendations for implementation will be presented to Department and bureau leadership for approval as soon as feasible thereafter, with implementation expected by 2003.

Quarterly Data Reporting

The Department has developed a quarterly data reporting system to track progress in achieving GPRA goals. The bureaus are required to electronically submit performance data on a quarterly basis into a central Web-based database containing all Department and bureau performance data. The quarterly submittal schedule provides the ability to measure progress towards individual performance goals throughout the annual performance planning period. Departmental managers are able to access performance information through this new system.

The Departmental Management offices periodically meet with bureau deputy directors and planning staff to review performance results to date and discuss GPRA-related strategies, issues, and successes. The Departmental Management offices advises bureau leadership of potential performance issues and encourages self-assessments using the departmental data verification and validation matrix as well as streamlined assessment tools developed by the Department (see below). In addition, the Interior Management Council (IMC) has taken an active role in monitoring departmental performance information. The IMC reviews summaries of the quarterly reports and addresses related issues as they arise.

Self-Assessments

The Department has developed and initiated a streamlined self-assessment organizational tool to help improve performance. It is a condensed version of the Baldrige quality self-assessment tool for targeting organizational improvements. Several bureaus successfully applied test runs of this assessment tool in 2001.

Coordination with the Office of Inspector General (OIG)

The Department assists the OIG by providing information on the GPRA goals that address OIG management issues as well as GPRA goals that appear in the Accountability Report. As the OIG initiates new audits, the Department participates in entrance interviews and provides performance information and any relevant goals and measures that pertain to the program under review. In the course of conducting audits, the OIG examines whether issues are covered by appropriate performance goals and measures. Depending on the nature of the program, issues raised, or OIG program recommendations, the OIG may recommend using performance goals and measures to help track resolution of the issues. These performance measures may become part of a GPRA annual performance plan or may be tracked internally. The Department is working with the OIG on approaches to reviewing GPRA documents and data systems. To the extent possible, the Department intends to continue to coordinate this work with the OIG to help improve compliance with GPRA and foster performance and results driven management in the Department.

Program Evaluations

Program evaluations are an important tool for analyzing the effectiveness and efficiency of Interior programs, and for evaluating whether they are meeting their intended objectives. Interior programs are evaluated through a variety of means, including performance audits, financial audits, management control reviews, and external reviews by Congress, OMB, and other organizations, such as the National Academy of Public Administration and the National Academy of Science. The Department uses self-assessments to verify that performance information and measurement systems are accurate and supportive of Interior's strategic direction and goals. Data collection and reporting systems processes are reviewed and improved through the use of customer and internal surveys.

The Department also relies on outside reviews and audits of the strategic planning and performance management processes by GAO and OIG. GAO has conducted several reviews of Interior's strategic plans and annual performance plans, as well as more specific reviews of individual bureau GPRA implementation efforts. These reviews have been very helpful in identifying best practices and focusing attention on areas needing improvement.

The annual performance plans for Interior's bureaus include more detailed discussions of specific performance evaluations and their relationship to bureau programs. Some examples of planned program evaluations are listed in *Figure 11*.

Figure 11

| Representative GPRA Program Evaluations | | |
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| <i>Bureau</i> | <i>Program/Goal</i> | <i>Methodology/Purpose</i> |
| Goal 1: Protect the Environment and Preserve Our Nation's Natural and Cultural Resources | | |
| NPS | Condition of National Historic Landmarks | NPS internal evaluation |
| BIA | Assess compliance with federal environmental laws | Five audits to be conducted annually by EPA contractor |
| Goal 2: Provide Recreation for America | | |
| BLM | Recreation Fee Demonstration | Survey and site visits to state and field organizations |
| NPS | Evaluate visitor survey card methodology | Peer review by industry customer satisfaction professionals |
| Goal 3: Manage Natural Resources for a Healthy Environment and a Strong Economy | | |
| BLM | Rangeland health evaluations and grazing permits | Surveys, management control reviews, and site visits to state and field organizations |
| BOR | Critical Infrastructure Assurance Program | Internal four-phase review process |
| Goal 4: Provide Science for a Changing World | | |
| BLM | Threatened and Endangered Species | Surveys, management control reviews, and site visits to state and field organizations |
| USGS | Data preservation and Standards | External review by the National Research Council |
| Goal 5: Meet Our Trust Responsibilities to Indian Tribes and Our Commitments to Island Communities | | |
| MMS | Cash Management and Revenue Disbursement | Internal alternative management control review |
| BIA | Assess quality of education programs and services | Annually by administrative program reviews |