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REPORT TO THE CONGRESS

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Improvements Needed In Training
And Technical Assistance Services
Provided To Antipoverty Agencies

B-130515

Office of Economic Opportunity

*BY THE COMPTROLLER GENERAL
OF THE UNITED STATES*

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APRIL 26, 1972



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-130515

(1) To the President of the Senate and the
Speaker of the House of Representatives

This is our report on improvements needed in training and technical assistance services provided to antipoverty agencies by the Office of Economic Opportunity.

Our review was made pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C. 67).

Copies of this report are being sent to the Director, Office of Management and Budget, and to the Director, Office of Economic Opportunity.

A handwritten signature in cursive script, reading "James B. Aberts".

Comptroller General
of the United States

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ABBREVIATIONS

GAO	General Accounting Office
OEO	Office of Economic Opportunity

D I G E S T

WHY THE REVIEW WAS MADE

This is the third of a series of General Accounting Office (GAO) reports on contracting activities of the Office of Economic Opportunity (OEO).

OEO enters into contracts and grants to provide training and technical assistance to local antipoverty agencies so that they can operate their programs more efficiently and can better achieve their objectives. During fiscal years 1965 through 1971, OEO obligated about \$110 million for training and technical assistance services. (See p. 6.)

To determine whether antipoverty agencies were obtaining the benefits anticipated from these services, GAO reviewed the results of the services provided under 11 selected contracts for about \$4 million awarded during fiscal years 1968-70. GAO also made a follow-up review to ascertain whether improvements needed in contracting procedures had been made for services to be provided in fiscal year 1972.

FINDINGS AND CONCLUSIONS

Training and technical assistance services provided under the contracts reviewed did not satisfy, to a significant extent, the needs of local antipoverty agencies. Improvements were needed in OEO's planning, monitoring, and evaluating the contracted services.

Inadequate planning

OEO program offices did not find out what the specific needs of local antipoverty agencies were prior to awarding the contracts. For example:

- Services could not be provided under one contract because the antipoverty groups which were to receive the technical assistance had not been organized.
- Services could not be provided under another contract because the agencies and the specific type of assistance had not been identified. (See p. 9.)
- Services were inadequate or inappropriate to satisfy agency needs. (See p. 11.)

--Agencies refused to accept the services because they were dissatisfied with the services they previously had received from OEO contractors. (See p. 15.)

--Several contractors expended time and effort to determine prospective recipients' needs, sometimes with unsatisfactory results. (See p. 17.)

To determine whether antipoverty agencies considered the services paid for by OEO satisfactory, GAO sent questionnaires to 42 community action agencies in one OEO region. Of 19 agencies responding, six replied in the negative. (See p. 11.)

Because of dissatisfaction with OEO contractor services, 14 of the larger community action agencies operating in California refused to accept the services contracted for by OEO. They formed a pool of training and technical assistance capabilities within their own organizations. (See p. 15.)

Under several contracts the services to be provided had not been scheduled adequately in advance by OEO, the contractors, and the recipient agencies. As a result, training sessions were poorly attended and technical assistance services were not provided timely. (See p. 21.)

Although OEO had recognized the need for correcting the deficiencies in planning and had issued improved planning policies and procedures, further efforts were needed to implement these improvements. (See p. 24.)

GAO's follow-up review of training and technical assistance contracts for services to be provided during fiscal year 1972 showed that little progress had been made in identifying specific agency needs prior to award of the contracts and in establishing advance schedules for the delivery of contractors' services. (See p. 26.)

Inadequate monitoring and evaluation

Adequate monitoring of contractor performance and evaluation of contract results would have enabled OEO to identify and take action to correct the unsatisfactory conditions noted by GAO. OEO would have been in a better position to (1) know whether the services were helping antipoverty agencies, (2) correct weaknesses in strategy, design, and techniques, and (3) formulate improved plans for future training and technical assistance efforts. (See p. 30.)

The following weaknesses were noted in OEO's contract management.

--In some cases OEO had not assigned promptly project managers who could have participated in planning the contracted services and who could have guided contractor performance throughout the contract period. (See p. 31.)

--No evaluations had been performed of the impact of the training services on the agencies to determine whether the intended objective of strengthening antipoverty programs had been achieved. (See p. 36.)

OEO recognized the need for improved monitoring and for establishing an evaluation system both at headquarters and at regional offices. Although the necessary framework of policies and organizational responsibilities had been provided, specific implementing instructions had not been issued that would facilitate effectively carrying out these important management functions.

RECOMMENDATIONS OR SUGGESTIONS

GAO recommends that OEO:

- Issue guidelines specifying how improved planning for furnishing training and technical assistance should be accomplished, monitor their implementation, and provide training to the officials assigned to carry out the planning responsibilities.
- Provide for the designation of a project manager for each contract as soon as the need for contract services has been established.
- Issue specific guidelines for improving the monitoring and evaluation of training and technical assistance efforts and provide the officials responsible for these functions with the training they need to monitor contractor performance more effectively, evaluate benefits obtained, and use evaluation results effectively. (See p. 39.)

AGENCY ACTIONS AND UNRESOLVED ISSUES

OEO recognized the shortcomings in the training and technical assistance services provided to antipoverty agencies. OEO stated that measures had been taken to reduce the furnishing of training and technical assistance through contractors.

OEO has made allocations of its training and technical assistance funds to its regional offices together with the responsibility for planning, implementation, and utilization of the funds.

OEO has started, on an experimental basis, a program of granting antipoverty agencies funds which are to be used to purchase their training and technical assistance or to build training capability within their agencies. OEO plans to provide a workshop on monitoring and evaluating grantee programs to those persons concerned with the grants.

To improve project management of training and technical assistance contracts an OEO task force was appointed to revise instructions on grant and contract management procedures and policies. Also workshops on project management have been held for project managers of all training and technical assistance projects. (See p. 40.)

MATTERS FOR CONSIDERATION BY THE CONGRESS

This report is being issued to the Congress in view of its continued general interest in OEO activities and because several committees and members of Congress have expressed specific interest in OEO contracts for training and technical assistance services.

CHAPTER 1

INTRODUCTION

Under title II of the Economic Opportunity Act of 1964, as amended (42 U.S.C. 2781), OEO finances urban and rural community action programs for assisting low-income persons to become fully self-sufficient. Section 230 of the act authorizes the Director, OEO, to enter into contracts and grants to provide training and technical assistance to those communities involved in developing, conducting, and administering community action programs funded under title II.

The general purpose of the training and technical assistance is to help agencies operating antipoverty programs to achieve their objectives more efficiently and effectively. The specific purposes of training and technical assistance are to:

- Ensure effective organization and management of community action agencies.
- Provide program expertise to maximize program impact and innovation.
- Aid in effective involvement of the poor in achieving the goals of community action programs.
- Support career development for community action agency nonprofessional employees.
- Train Federal staff members working with community action programs in providing technical assistance in the areas of citizens' participation, community action agency management, mobilization of resources, manpower, employment, community organization, and housing.

Prior to October 1968 OEO headquarters initiated, awarded, and administered nationwide contracts for training and technical assistance services. In October 1968 much of the responsibility for initiating and administering training and technical assistance was delegated to OEO's regional offices in an effort to make community action program activities

more responsive to local needs. Although the detailed planning and day-to-day administrative responsibilities were largely decentralized to OEO regions, the Training and Technical Assistance Division at OEO headquarters remained responsible for directing and coordinating training and technical assistance funded under section 230 of the act.

From fiscal year 1965 through fiscal year 1971, OEO obligated about \$110 million for training and technical assistance services.

This is the third of a series of reports on OEO's contracting activities. We issued a report on December 15, 1971, entitled "Contract Award Procedures and Practices of the Office of Economic Opportunity Need Improving" and a second report on December 28, 1971, entitled "Improvements Needed in the Administration of Contracts for Evaluations and Studies of Antipoverty Programs."

SCOPE OF REVIEW

Our review was directed toward evaluating whether the policies, procedures, and practices followed by OEO in initiating and administering contracts for training and technical assistance were adequate for ensuring that the recipient antipoverty agencies obtained the benefits intended from these services.

We selected for review 10 training and technical assistance contracts that had been funded by three of OEO's 10 regional offices during fiscal years 1968, 1969, and 1970 and one contract funded by an OEO headquarters program office. The 11 contracts amounted to about \$4.1 million.

We reviewed applicable legislation and OEO policies, instructions, and program data. We reviewed also pertinent contract records at OEO headquarters; at OEO regional offices in Chicago, Illinois; Austin, and later Dallas, Texas; and San Francisco, California; at the contractors' offices; and at community action and other agencies that had been provided with training and technical assistance services under the 11 selected contracts. We interviewed, or obtained written comments from, officials of OEO headquarters and regional offices, contractors, and about 120 of the approximately 300 recipient agencies.

We also made a follow-up review in July and August 1971 at the three regional offices to ascertain whether improvements had been made in contracting procedures for training and technical assistance services to be provided in fiscal year 1972.

CHAPTER 2

IMPROVEMENTS NEEDED IN PLANNING

TRAINING AND TECHNICAL ASSISTANCE SERVICES

Improvements in OEO's planning of training and technical assistance services were needed to ensure that the significant funds spent for this purpose enabled antipoverty agencies to obtain the help they needed to better carry out their programs. The efficiency and effectiveness of the services provided under the contracts we reviewed had been adversely affected because:

- OEO had not identified the specific training and technical assistance needs of prospective recipient agencies prior to awarding contracts to provide such services.
- OEO had not adequately scheduled the delivery of the services nor obtained commitments from intended recipient agencies to accept the services.

RECIPIENT AGENCIES' NEEDS NOT IDENTIFIED BEFORE CONTRACT AWARDS

OEO offices responsible for initiating the 11 contracts we reviewed had not identified the specific needs of prospective recipient agencies as a basis for entering into the contracts. These offices, for the most part, had requested the contract services on the basis of their knowledge of the general areas of antipoverty agencies' needs.

Adequate planning by OEO of the proposed use of training and technical assistance resources is especially important because only limited funds are available for providing antipoverty agencies with the help they need. The Deputy Director of OEO's Training and Technical Assistance Division informed us in March 1971 that training and technical assistance plans submitted annually by individual OEO program offices consistently had identified a universe of needs larger than could be met through available funds. In fiscal year 1970 OEO obligated about \$19 million for training and

technical assistance services, which represented about 3 percent of the \$650 million obligated by OEO in fiscal year 1970 to fund the title II programs of about 1,600 anti-poverty agencies.

We noted that inadequate identification of antipoverty agencies' needs had resulted in (1) agencies' contracting for services that could not be provided, (2) contractors' providing services that were inadequate or inappropriate to meet recipients' needs, (3) prospective recipients' refusing to accept the services, and (4) contractors' expending time and effort to determine prospective recipients' needs, sometimes with unsatisfactory results.

Contract services could not be provided

In the case of two contracts, the technical assistance services could not be provided because either the recipient agencies were not ready to receive the services or the recipient agencies and the type of assistance needed had not been identified.

In June 1968 OEO awarded a 1-year contract in the amount of \$88,936 for technical assistance to be provided to existing neighborhood antipoverty groups in six urban areas that had been designated by the Department of Housing and Urban Development to receive Model Cities Program funds. The terms of the contract, in part, required the contractor to assist existing groups

- to develop effective citizen participation in the program-planning effort of the model neighborhood;
- to increase the neighborhood groups' capacities to initiate programs and to react to programs developed as a part of the model cities and community action program planning processes;
- to increase the neighborhood groups' resourcefulness and technical competence and to decrease their dependence on outside sources of technical assistance;
- to demonstrate innovative approaches in developing in neighborhood groups independent technical

capacities to initiate, evaluate, and implement neighborhood-based programs and planning activities;

- to effectively incorporate and utilize other Federal, State, and local public and private sources of planning funds to achieve the above purposes; and
- to develop a regional communications system among groups of low-income residents within model neighborhoods.

In November 1968, 5 months after the award of the contract, the contractor reported to OEO that, in five of the six cities in which technical assistance was to be provided, there existed no neighborhood antipoverty groups which were concerned with Model Cities and which represented low-income residents. At the end of the 1-year contract period, the contractor reported to OEO that, because of the unrealistic assumption that the neighborhood groups had existed and could have received the assistance, the nature and scope of the services had been changed from providing assistance on specific problems to organizing and assisting in the establishment of the neighborhood groups.

In May 1969 a contract amendment increased the contract amount to \$108,936 and included neighborhood groups in additional cities to which technical assistance was to be provided. In June 1969 OEO extended the contract for an additional 12 months, to June 30, 1970, and increased the contract amount to \$158,820.

The OEO program official primarily responsible for preparing the request for a proposal for the contract told us that he had not been aware, at the time the contract was awarded, that the need of the community was for assistance in organizing neighborhood groups rather than for technical assistance to existing groups.

On June 30, 1969, OEO awarded a contract in the amount of \$226,720 for a comprehensive program of technical assistance to community action and other antipoverty agencies. The contract required that technical assistance be provided by specialists qualified in the areas of housing, manpower, economic development, and community organization and named

the seven States in which the services were to be provided. The contract, however, did not identify the specific agencies and organizations to which the technical assistance was to be provided. Also the contract did not specify the type of assistance to be provided but included a general provision that the contractor (1) conduct an onsite review to determine the type of technical assistance needed and (2) furnish the needed assistance.

After the first 3 months of the contract period, the OEO regional office suspended assistance under the contract for 2 months until it could establish a procedure under which the recipient organizations would request technical assistance and OEO would evaluate the appropriateness and urgency of the requests. During the 2-month suspension, OEO had to reimburse the contractor for retaining staff members who should have been used to provide technical assistance.

Services inadequate or inappropriate
to satisfy recipients' needs

To solicit a representative number of recipient agencies' views regarding the adequacy of contract services financed by OEO, in June and July 1970 we sent questionnaires to 42 community action agencies or related groups that had been provided with training or technical assistance under one or more of three contracts in one OEO region during fiscal year 1970. We received responses from 24 of the agencies. In response to our question concerning whether the services that had been provided met their needs, six agencies replied negatively, 13 replied affirmatively, and five did not reply.

The following responses with respect to services received under a contract in the amount of \$88,000 illustrate the dissatisfaction expressed by one community action agency.

When and why was technical assistance requested?

"We never asked for it *** but we were called and told that some time was available and a man would be down for 2 days and would arrive the next day.

"This wasn't very convenient, but we called all Senior Staff together we could and met with *** [the contractor]."

What kind of technical assistance was furnished?

"We were in the process of re-submitting our proposals for re-funding and so he was going to discuss the grant application process."

Was technical assistance timely and adequate?

"He didn't ask us what we wanted or needed but proceeded to start back in the whole process at the beginning. We were just about finished and were within 2 weeks of submitting our proposals, so most of what he was saying wasn't very pertinent."

This community action agency also commented unfavorably on the services it had received under another contract in the amount of \$290,000 under which technical assistance was to have been provided in the fields of manpower, housing, economic development, and community organization.

When and why was technical assistance requested?

"Team was to come and do a survey of County programs and evaluate our needs for additional technical assistance."

What is your general evaluation of the technical assistance provided to you, particularly its strongest and weakest points?

"3 men spent 2 full days talking to us and reviewing our programs. When they finished they called the Central Office Staff in to make their report. It was an amazing performance, because they gave us back almost word for word the information we had given them the previous day.

"We were disappointed in the group and never heard directly from them with a written report after they left. There was no further follow up until OEO sent a copy of their actual report."

What effect have each of these consultants had on your Community Action Programs?

"Staff received no benefit from the 2 days of technical assistance because it was so one-sided; the CAA staff talked and the *** [contractor] staff listened and then reported it back as information to the Central staff."

Another community action agency responded to our questionnaire in the following manner:

"Our experience with *** [two of the three contractors] has been so limited and generally so unsatisfactory that specific answers to the questions listed in your letter *** appear unnecessary.

"In April [1970], we requested the services of *** [the first contractor] for the purpose of devising a coordinated and integrated overall economic development plan for this Agency. The consultant appeared for only one day with a major portion of the time spent in conversation with the undersigned *** [executive director]. We were assured that a report would be forthcoming the very next week. We have yet to receive any report ***.

"We had but one contact with the representative from *** [the second contractor] in *** a meeting arranged at his request and convenience. Although he appeared knowledgeable and capable the subject matter was not pertinent to our needs. We received unnecessary reminders of 'meaningful participation of the poor,' of the value of establishing goals and objectives and of assembling statistical data dealing with target areas. Generalizations rather than specific solutions were offered."

We visited a number of other agencies in the same OEO region that had been provided with training and technical assistance under the three selected contracts during fiscal year 1970 to obtain their views on the adequacy of the services received by them.

The executive director of one community action agency told us that, although he had requested specialized assistance in developing a housing project, the consultant assigned did not have the expertise necessary to satisfy the agency's need. He told us also that he had spoken to the contractor prior to the visit and that, on the basis of his questioning, he had concluded that the consultant could not give the needed assistance and had suggested that the planned visit be canceled; however, the contractor had insisted on the consultant's making the visit.

According to the director, the consultant spent 2 days in attempting to give the assistance needed but the information provided was too general to benefit the agency. The 2 days of contractor assistance cost OEO about \$440.

Officials of another community action agency informed us that they had requested the contractor's help in developing a rental-housing project and that, in response, a contractor's consultant made an unscheduled visit to the agency when the agency officials involved in the project were not available for discussions.

The director of the agency's housing development program told us that the consultants, at a subsequently scheduled meeting, had devoted most of their time to discussing housing programs and related information which already was known to the agency and that, 44 days following the meeting, the agency received a letter report from the contractor's consultants that contained no information that was useful to the agency. The director also said that he again had requested technical assistance for the rental-housing project but that at the time of our visit, which was 2 months later, the assistance had not been provided and the project's problems still were unresolved. In this case 5 days of contractor's technical assistance cost OEO about \$1,100.

A third community action agency that we visited provided us with the following written assessment of the technical assistance provided by one OEO contractor.

*** [the contractor] *** presented much verbage and preliminary service, but no follow through. He provided poor coordination, was late for

appointments, didn't show up at all on a number of occasions, provided poor communication, and was unproductive. ***

"The *** [agency's] relationship with *** [the contractor] made many people connected with this organization leery of technical assistance in general."

Officials of this agency told us that certain information furnished by the contractor later had been found to be incorrect and had resulted in the agency's spending both time and money in an effort to obtain a grant that it was not eligible to receive. The cost to OEO was about \$1,500 for 7 days of consultant services.

Prospective recipients refused to accept offered services

A number of potential recipients refused to accept or to participate fully in training and technical assistance services contracted for by OEO.

The most significant instance of refusal which we noted had occurred in the State of California where, because of their dissatisfaction with OEO contractor services, certain members of the California Community Action Program Directors Association had banded together to establish a pool of training and technical assistance capabilities and had refused to accept the consultant services contracted for by OEO.

Officials of OEO's San Francisco Regional Office informed us that, as of November 1970, 14 of the 42 California community action agencies, including several of the larger agencies in the State, had taken this course of action. In fiscal year 1970 these 14 agencies received OEO grant funds of approximately \$27 million, or 60 percent of the \$44.5 million which OEO had granted for all California community action programs.

Our inquiries at other community action agencies in California indicated, for the most part, similar dissatisfaction with training and technical assistance services under OEO contracts, although the agencies continued to use

such services. The executive director of one community action agency informed us that he understood and sympathized with the goals of those members of the association refusing to accept consultant services but that his agency had not joined because it was in dire need of technical assistance "of any quality." Another agency not included among the 14 boycotting agencies expressed its dissatisfaction in a letter to the OEO regional director that stated, in part, that:

"in view of the fact that our organizations, like so many of its sister agencies, have labored under a system of arbitrary and generally dissatisfying training and technical assistance grants for nearly five years now, we would like to have a 'breather' to fully assess the current situation. Both our staff and boards, not to mention our constituents, are still trying to figure out what tangible results they have from the rather massive doses of general, banal and non-applicable 'training' received thus far.

"In considering the above, compounded by the lack of input and general consideration given the user agencies in determining most recent Regional Training Plans and Resources, our agency has gone on record expressing complete dissatisfaction with the current T&TA [training and technical assistance] set up."

In another OEO region we noted that community action agencies had been reluctant to participate in an OEO training project. On June 30, 1969, OEO awarded a contract in the amount of \$95,000 that, among other things, required the contractor to provide at least 368 man-days of professional services in the development and presentation of short training courses to community action agencies in two increments--the first was to deal with the basic elements of planning and the second was to provide more complex training in the areas of community and coalition planning and various strategies for mobilizing public and private resources. Approximately \$53,000 of the contract amount was allocated to providing both increments of the training.

Of the 16 community action agencies that were scheduled for the training, two did not attend either session, two did not attend the second session after attending the first, and some of the trainees of the other 12 agencies did not participate in both training sessions. Although some agencies considered the training adequate, officials of seven of the agencies stated that they had been dissatisfied with the training because it was too general or was not pertinent to their agencies' needs.

The contractor informed us that other reasons, such as distance from training sites and the time of training, also had been cited by the agencies for the nonattendance.

Planning by contractors did not achieve
best contract results

Under six of the contracts totaling about \$3.3 million, the contractors either were required by the terms of the contract or undertook on their own to make assessments of recipients' needs as the bases for providing training and technical assistance services. We believe that this arrangement was unsatisfactory because contractor time and effort spent in identifying needs

--should have been devoted to providing training and technical assistance services,

--did not adequately identify recipients needs, and

--created a situation where, in effect, the contractors determined the scope and nature of their own work.

Following are some of the specific situations we noted.

A contract awarded by OEO on June 30, 1969, required the contractor to implement a training program for various community action agencies in one State and to plan and establish goals for the training program. The contractor spent the first 4 months of the 12-month contract period in assessing the agencies' specific needs, specifying training goals, organizing the training program, and establishing a training schedule.

The contractor billed OEO for about \$35,000, or 27 percent of the total estimated contract amount of \$128,000, for work performed prior to the first training session which was held in the 5th month of the contract period.

Another contract awarded by OEO on June 30, 1969, in the estimated amount of \$866,701, required the contractor to provide 4,264 man-days of training to board members and staffs of at least 50 community action agencies located in one OEO region, as follows:

<u>Group to be trained</u>	<u>Man-days</u>
Community action agency boards	400
Resident advisory councils	200
Administrative staffs	1,200
Middle management training	1,200
Outreach service workers	1,200
Trainer training	<u>64</u>
Total	<u>4,264</u>

OEO officials informed us that the contractor, to tailor the training more precisely to the needs of the particular agencies, had been authorized verbally by OEO's regional training and technical assistance chief to use some of the authorized training time to make diagnostic visits to the community action agencies to determine their needs. The contractor reported to OEO that 306 man-days had been spent for this purpose, which we estimate cost OEO about \$62,000 on the basis of the total man-days budgeted and the total amount of the contract.

We noted indications that the contractor's diagnoses of needs had not achieved the desired objective. An OEO regional office evaluation team which reviewed the contractor's performance under the training contract stated in its May 25, 1970, report that:

"It was observed by the Evaluation Team, and concurred by the *** [contractor] personnel who were interviewed, that pre-training diagnostic analysis *** has been rather weak, unstructured, and

in some instances not a totally valid picture of what the Community Action Agency necessarily needs in the field of training."

The evaluation team's observation was substantiated by comments of some of the agencies participating in the contractor's training program. One community action agency told us that the training provided was not what had been requested; another agency expressed the view that the contractor had provided training in areas where training already had been given and had failed to provide training in some areas where training was needed.

Our inquiries, together with responses received to a questionnaire which the contractor had used to obtain recipient agencies' comments on the training program, showed that 42 of the 61 community action agency executive directors who had assessed the training provided to their agencies were of the opinion that the training should have been related more specifically to agency needs.

The problem of having a contractor perform a needs assessment and then furnish services determined to be needed was recognized, in part, by OEO's Training and Technical Assistance Division in an April 23, 1970, memorandum to all OEO officials responsible for initiating training and technical assistance contracts. The memorandum directed that OEO make the selections of antipoverty agencies to be served and identify the agencies in each contract, to eliminate contractors' discretion in selecting agencies to be served.

We noted that contracts awarded by OEO after the date of the memorandum generally had identified the antipoverty agencies to receive the contractors' services. Three OEO contracts awarded on June 30, 1970, for performance of services in fiscal year 1971, however, included requirements that the contractors determine the need for the services to be provided.

In commenting on this matter, some contractors expressed the view that in certain situations, especially if it was a contractual requirement, contractors could perform effective needs assessments prior to providing the desired services

and that such assessments were critical and useful mechanisms for involving the potential participants in the training effort. They agreed, however, that OEO should approve the contractors' plans prior to the plans' implementation.

We believe that the assessment of needs and the furnishing of services determined to be needed are responsibilities that should be carried out independently to ensure an objective identification of needs and the assignment of the best qualified contractor to meet the needs.

DELIVERY OF SERVICES NOT ADEQUATELY SCHEDULED

The services to be provided under several contracts had not been scheduled adequately in advance by OEO, the contractors, and the recipient agencies, and, as a result, the training and technical assistance services were not provided timely and training sessions were poorly attended.

To ensure that training and technical assistance services are relevant and timed to meet agencies' needs and to benefit a maximum number of agencies and their staffs, the timing of the services should be carefully planned and scheduled, including the identification of those who should participate in the services and the times, places, nature, and duration of the training or technical assistance. Effective advance scheduling necessitates close communication and coordination between OEO, antipoverty agencies, and contractor personnel.

When scheduling contractors' services, OEO should seek an advance commitment by the recipient agencies to participate to the fullest extent in the scheduled training or other assistance activities. To enable such participation, OEO should provide antipoverty agencies with adequate funds to pay for travel, subsistence, and other expenses that will be incurred by their staffs in attending training sessions.

Poor attendance at training sessions

OEO training contractors generally are paid to conduct a predetermined number of separate training sessions for an estimated number of trainees or for staffs members of antipoverty agencies. Unless these sessions are attended by the estimated number of participants, the training services do not have a full impact on the agencies intended to benefit therefrom and, as a result, the Government's cost for each trainee is increased beyond that planned. Examples of such cases noted in our review follow.

Example 1--On June 30, 1969, OEO awarded a contract at an estimated cost of \$128,000 to provide training to the boards of directors, executive directors, and senior staff members of various community action agencies in a State.

The agencies selected to participate in the training sessions had not been notified and consequently had made no commitments for attendance.

The contractor's quarterly narrative reports to OEO identified poor attendance at the training sessions as a problem. The contractor's second quarterly report stated that:

"The one disquieting factor encountered in the training was the lack of attendance of board members. The contract calls for consecutive evening sessions for a total of six hours. *** For five agencies which have received board training under the two consecutive evening set-up, attendance for both evening sessions averaged out at twenty percent--not even enough for a quorum."

Another contractor retained by OEO to review the effectiveness of this training contract reported that only 27 percent of the potential participants had attended the training sessions for board members.

Example 2--A contract awarded by OEO on June 30, 1969, in the estimated amount of \$866,701 provided for the training of board and staff members of at least 50 community action agencies located in an OEO region. Neither OEO nor the contractor maintained complete and accurate attendance records regarding the training provided to the 65 agencies participating in the program. Our inquiries at several recipient agencies, our onsite observations of selected training sessions, and our review of available attendance records, however, revealed the following data indicating inadequate attendance by the recipient agencies.

1. Eight community action agencies canceled a part of the training scheduled for them for such reasons as (a) scheduling conflicts, (b) inability to gather board and council members for training, and (c) the belief that the saturation point in training had been reached.

2. Of the 71 scheduled participants of one community action agency, only 32 percent attended the entire 3-day training session; 14 and 30 percent attended 1 day and 2 days, respectively, of the training session; and 24 percent did not attend any of the sessions. The agency's executive director informed us that conflicts in work and training schedules had caused the low attendance.
3. Attendance data available for 12 community action agencies showed that, of about 430 trainees scheduled to attend the training sessions, 165, or about 38 percent, did not attend any of the sessions. Of these 12 agencies, only two had a 100-percent participation record and five had 35 percent or less of their scheduled trainees attend the training sessions.

Technical assistance services not provided timely

The need for advance scheduling of technical assistance services was highlighted in an April 1970 report to OEO by one of its technical assistance contractors. The contractor's report stated that:

"It has been our impression, from talking to CAA [community action agency] staffs, that certain types of assistance rendered to CAAs have not been fully responsive to their needs. Too often, it has seemed to us, assistance has been rushed in when a crisis atmosphere prevails, when in fact the assistance might well have been more productive if made available on a planned basis at a calmer time.

"*** CAAs should be informed well in advance that a specific type of assistance is to be made available on specific dates. It has been disconcerting for us to contact CAAs a day or two prior to our visit only to learn that either they were unaware that *** [the contractor] was scheduled to visit them or they had no clear idea of just what type of assistance we were qualified to render."

We noted instances where technical assistance services had not been provided timely (see p. 11) and where agencies had considered the services to be inadequate or inappropriate to meet their needs. In some cases contractor personnel had visited an agency without prior announcement, or against the suggestion of agency officials, or at times that were not convenient or beneficial to the agency. In a July 30, 1970, letter to an OEO regional director, one agency stated its position on unscheduled consultant visits as follows:

"*** we have been advised that the Consulting firm *** had, through Regional OEO, established a 'visitation' for general purposes August 4th and 5th.

"*** we still feel very strongly that such 'assistance' should always be by invitation, and we are clearly not inviting *** [the contractor's] assistance at this time."

OEO POLICIES TO CORRECT PLANNING DEFICIENCIES
NEED IMPLEMENTATION

In the latter part of fiscal year 1970, OEO advised its training and technical assistance personnel of the need for correcting several planning deficiencies corresponding to those revealed in our review. In April 1970 OEO's Training and Technical Assistance Division issued two memorandums which specified that improved planning include identification of needs and assessment of priorities.

The first memorandum, issued on April 23, 1970, stated that:

"Planning must start with a need analysis of some kind. Preferably this would start at the CAA *** level. Whether this involves an intensive survey or one using all the information we have available without intensive processes is less important at first than getting the process started."

* * * * *

"Once this is done, a compilation of need should be done to develop some kind of a phasing of delivery and to combine Regional Office priorities in the mix. When the local and Regional Office needs are combined, the process of balancing all that against what Headquarters will deliver and what the budget will bear is next. If the needs substantially exceed the budget, the process of priority setting becomes essential."

The memorandum also stressed the need for improved in-house coordination and cooperation in the planning and execution of training and technical assistance contracts. The memorandum stated that:

"In no instance has the T&TA function been formally and effectively tied into the field operations structure. We feel now that effective tie-ins can be accomplished only by formal assignments of T&TA coordination responsibility to a member of each District staff. This may be a full or part-time Field Representative, a program aid [sic] or some other person but we cannot see how anything short of this will work."

The second memorandum, issued on April 27, 1970, identified the following problems related to inadequate identification of needs and the untimely training and technical assistance services.

"Many complaints from Regional Offices and CAAs relate to the 'inconvenient' unscheduled arrival of 'assistance.' T&TA Headquarters is concerned that we may often procure T&TA services on the basis of general need and only subsequently decide just how much we put where and when. Perhaps this pattern is related to CAA complaints. Often this places T&TA in the posture of generating projects--of developing programs--rather than supporting programs."

The memorandum specified that training and technical assistance be limited to program support activities and be provided only in response to antipoverty agency or other requests.

In June 1970 OEO issued instructions for developing a formalized plan for training and technical assistance services. The instructions defined the overall mission and goals of the training and technical assistance program, identified the planning responsibilities of the various OEO offices, and summarized the operational elements involved in executing and managing training and technical assistance efforts.

Although OEO's June instructions established policies and procedures to correct the planning deficiencies noted in the April 1970 memorandums, they did not include sufficiently specific guidelines for program and regional offices to implement the policies and procedures. Thus the Director of the Training and Technical Assistance Division commented in November 1970, after reviewing many of the plans submitted in accordance with the June 1970 planning instructions, that adequate plans were not being developed, partly because:

"We seriously overestimated the extent to which people are capable of analyzing need, defining objectives, prescribing related action, and providing for management of projects as a basic process for committing and managing the Federal funding process."

- - - -

We made a follow-up review, in July and August 1971, at three regional offices to ascertain the degree of improvement in the contracting procedures for training and technical assistance services to be provided in fiscal year 1972. Our review of six new contracts, five of which were awarded in June 1971 by two of the regional offices--the third office had not awarded any new contracts--revealed that, at the first regional office:

--Four of the five contracts awarded had required the contractors to assess the needs of the agencies that were to receive their services.

--Only three community action agencies had submitted answers to questionnaires that showed what they

believed to be their needs for assistance. For the other approximately 180 community action agencies in the region, the questionnaires were completed by OEO field representatives who had contacted in only 24 instances the community action agency or the State Economic Opportunity Office for information about training and technical assistance needs.

At the second regional office, we found that:

- Although the community action agencies had been requested to identify specific training and technical assistance needs, the OEO regional office, in compiling the replies, had fitted them into one of 15 general categories, such as health, education, manpower, or housing. The region also compiled information on community action agency needs as visualized by the OEO field representative using the same 15 general areas.
- A new contract had been awarded for training and technical assistance in the manpower area even though the manpower area was 12th in priority in both of the above-mentioned compilations. We were told that OEO Headquarters had given manpower a priority classification because the general feeling in OEO Headquarters and the region was that more manpower training and technical assistance was needed.
- Even though many community action agencies did not have manpower programs, all were included in the manpower contract because it was believed that such training would be necessary for programs that community action agencies probably would begin under expected future legislation, including revenue sharing.

At the third regional office, our follow-up review revealed that:

- The region had taken steps to improve planning for its contracts by requiring community action agencies to submit plans for meeting their training and technical assistance needs. The existing contracts,

however, had been extended to provide training and technical assistance to approximately 25 community action agencies, although information on specific training and technical assistance needs of most of these agencies was not available for consideration by OEO prior to extending the contracts.

--Priorities in specific training and technical assistance needs had not been established prior to the extension of the contracts.

--The delivery of training and technical assistance was not scheduled prior to the extension of the contracts.

--Training and technical assistance services were to be provided under the contract extension for at least one community action agency which, according to the chief of the region's training and program assistance branch, still was refusing to accept it.

CONTRACTORS' COMMENTS

We solicited written comments from the contractors whose services were the subject of our review. Those contractors who responded to our request expressed general agreement with our findings relating to the need for identifying the specific training and technical assistance requirements of the recipient antipoverty agencies and to the importance of advance scheduling before delivery of the services.

Some of the contractors pointed out specific problem areas inherent in the operations of the recipient agencies that hampered an effective delivery and acceptance of the intended services. They mentioned, in particular, limited staff and capability to absorb the offered technical assistance and such factors as distance, travel costs, and lack of time that prevented staff or board members of recipient agencies from participating in scheduled training sessions.

One contractor expressed the opinion that, during the last few years, improvements had occurred in the planning for training and technical assistance services but that

much further development was needed in planning and evaluating techniques for an effective delivery of such services for the benefit of antipoverty agencies.

CHAPTER 3

NEED FOR IMPROVED MONITORING AND EVALUATION

OF TRAINING AND TECHNICAL ASSISTANCE

Adequate monitoring of contractor performance under training and technical assistance contracts and the evaluation of contract results would have enabled OEO to identify and take action to correct the unsatisfactory conditions discussed in chapter 2. OEO would have been in a better position to (1) know to what extent training and technical assistance services were helping antipoverty agencies to better carry out their programs, (2) correct weaknesses in strategy, design, and techniques of the training and technical assistance program, and (3) formulate improved plans for future training and technical assistance efforts.

MONITORING CONTRACTOR PERFORMANCE

Under OEO's organizational structure, the responsibility for management and monitoring of a contract is assigned to a project manager designated by the contracting officer. OEO instructions specify that a project manager be a sufficiently high-level official capable of assuming the responsibilities for directing and controlling contractor operations and have a high degree of technical, professional, business, and managerial competence supplemented whenever possible by recent experience and training in the special requirements of project management.

The prescribed duties of the project manager are:

- To develop project statements of work, procurement requests, noncompetitive procurement justifications, proposal evaluation schemes, and proper cost estimates.
- To forecast difficulties far enough in advance to permit the development of alternative solutions.
- To avoid cost overruns through constant attention to project economies.

- To ensure reliable and quality contractor performance.
- To identify explicit progress milestones and to establish an appropriate information system to report on the progress of the project.
- To prepare an evaluation of contractor performance at the termination of the contract.

Strict adherence to the above instructions should have enabled OEO project managers to monitor contractor performance adequately. Our review, however, showed that OEO had not made prompt assignments of project managers nor obtained adequate performance information on the progress of training and technical assistance projects.

Assignment of project managers not made promptly

As the prescribed duties of the project manager include development of statements of work to be performed and participation in planning contract services, the assignment of a project manager should be made before the award of a contract and, to the extent possible, should not be changed throughout the term of the contract.

Our examination of 56 training and technical assistance contracts awarded by OEO in June 1970 showed that generally the contracts did not name the project manager but stated that the project manager would be a "Representative of the Government" designated by the contracting officer. In such cases a project manager often is not familiar with the need for, and the objectives of, the services to be provided by the contractor to enable him to adequately oversee and guide the performance of the services.

The following case demonstrates the adverse effect on the achievement of contract objectives that can result when a project manager is not assigned before the award of a contract and when the project manager is changed during the performance of the contract.

On June 30, 1969, OEO entered into a contract in the amount of \$169,220 for the development of a service to recruit executive directors for about 180 designated community

action agencies and for the recruitment of deputy directors, comptrollers, personnel managers, and manpower developers. The contract was to be completed within 18 months following its award.

As of August 1970 the contracting officer had not designated a project manager for this contract and, in the absence of a project manager, various OEO program offices having responsibilities for community action programs designated members of their staffs to act as project managers. Our discussions with OEO program officials revealed that, during the 14 months ended August 1970, five persons had been so designated. During a 6-month period, two of these persons, representing different OEO program offices, acted as project managers at the same time.

Although a number of persons unofficially monitored the contract, we believe that the uncertainty about who was officially responsible to ensure adequate contractor performance, coupled with the lack of continuity in carrying out this responsibility, permitted the following problems to go uncorrected until we questioned them.

- The minimum recruitment and placement requirements under the contract were not met.
- Some of the placements claimed were in positions not provided for in the contract.
- The contractor was seeking reimbursement from OEO for executive talent searches that did not involve community action agency executive positions and therefore were not authorized by the contract.

In September 1970 we informed the Director of OEO's Procurement Division of these problems. The Director acknowledged the weaknesses in the assignment and the carrying out of the project management responsibilities and in October 1970 obtained a written agreement from the contractor to perform additional executive searches to compensate for those placements claimed that were for positions not among those identified in the contract.

Contractor performance data not obtained

The project managers for seven of the 10 regional training and technical assistance contracts included in our review did not obtain specific contractor performance data needed to adequately monitor the contracts. Three of the seven contracts identified specific performance data to be made available to the project managers, but the requirements either were waived or were not enforced by the project managers.

Also OEO project managers for some of the contracts did not make periodic onsite visits to observe contractor performance and assess, on a first-hand basis, progress toward achieving intended objectives. For example, although one contract awarded by OEO on June 28, 1968, in the amount of \$158,820, had been in operation for a 2-year period, the project manager had made no onsite monitoring visits after the 2d month of the contract term.

The need for improved monitoring of training and technical assistance contracts was brought to OEO's attention by a consultant firm it had hired to evaluate and make recommendations to strengthen the training and technical assistance program. The consultant's report in July 1969 pointed out that every OEO regional office, without exception, had experienced serious difficulty in determining whether training and technical assistance contractors were meeting performance expectations.

The report concluded that, although proper monitoring and project control require the establishment of quantitative and qualitative performance standards, the training and technical assistance contracts rarely had included even the most basic cost bench marks or physical performance standards. The report recommended that performance objectives be established and that provision be made for collecting performance data necessary to determine achievement of the established objectives.

Another consultant firm employed by OEO for the purpose of studying the feasibility of evaluating the impact of training and technical assistance services presented similar conclusions in its report in August 1969.

The report concluded, in part, that, if the effectiveness of contract services was to be evaluated, firmer goals and more systematic recording and monitoring of training and technical assistance were necessary. The report also stated that neither trainers, nor community action agencies, nor regional or national OEO officers had determined the objectives to be accomplished or the extent of change they expected from training and technical assistance. The report stated also that there was no systematic recording of the amount and types of assistance provided to each community action agency and recommended that an improved recordkeeping system be instituted to facilitate not only evaluation but also planning and monitoring.

OEO has acknowledged the need to improve its monitoring of the training and technical assistance program. In March 1970, in response to the OEO Deputy Director's request for ideas on improving agencywide training and technical assistance planning and management, the Assistant Director for Operations identified several problems that had been encountered, such as:

- monitoring had been ad hoc;
- staff members had not been trained or required to do systematic monitoring;
- the monitoring process had not been built into each project; and
- there was no systematic training program to communicate successful monitoring experiences to staff members of OEO, economic opportunity offices of the States, or community action agencies.

The Assistant Director did not propose specific improvements that should be made but emphasized that any system devised by OEO for managing training and technical assistance services would need to be innovative in nature.

On April 23, 1970, the Director, Training and Technical Assistance Division, stated in a memorandum that:

"We are going to insist that a management process be in place that will enable us to know what is being delivered, by whom, for what purpose, and with what result. OEO is not prepared to fund any further training efforts unless we know what we are buying and can monitor performance. *** We want to know at all times what is being taught at our expense, what materials are being used, what goal is to be achieved, and whether the T&TA has been successful in relation to contractor obligations and trainee needs."

In September 1970 the Director sent a memorandum to the OEO regional offices that described the elements of a proposed regional headquarters monitoring system. The memorandum outlined the following purposes of the proposed system: (1) track progress against projection, (2) provide performance data on which to base key decisions, and (3) develop data for determining whether further inquiry is necessary.

In January 1972 the headquarters official in charge of training and technical assistance informed us that the proposed monitoring system had not been formalized into an operating instruction; however, one of three regional offices included in our review had issued its own detailed instructions on monitoring.

EVALUATION OF CONTRACT RESULTS

OEO had not developed specific guidelines for evaluating the results obtained under its training and technical assistance contracts nor provided any direction and training to officials assigned responsibility for the evaluation function. As a result, none of the 11 contracts we reviewed--of which seven had been completed at the time of our fieldwork--had been evaluated. Without making such evaluations, OEO was not in a position (1) to know whether the contracted services were achieving their intended objectives and (2) to identify and correct any weaknesses in the design or delivery of these services.

OEO had recognized, prior to our review, that evaluations were not being made of its training and technical assistance efforts. Instructions issued in June 1969, for developing a training and technical assistance plan for fiscal year 1970, provided that the responsibility for monitoring and evaluating training and technical assistance services funded under section 230 of the Economic Opportunity Act be divided between OEO Headquarters and OEO regional offices generally, as follows:

- The Training and Technical Assistance Division at OEO Headquarters was to develop policies and procedures for making evaluations, assist the regional offices in carrying out their responsibilities, and evaluate the impact of the services on community action agencies.
- The regional offices were to implement the prescribed policies for all regionally initiated and administered services and to incorporate a self-evaluation feedback system into each regionally initiated assistance program.

The two consultant reports, previously cited, affirmed the desirability of evaluating the impact that training and technical assistance services had on helping antipoverty agencies to improve their program operations. One of the consultant firms, in its report in July 1969, stated that:

"The *** evaluation of T&TA projects have long been neglected and this weakness continues to plague the Regional Offices. More important, failure to conduct comprehensive evaluations of T&TA program performance has led to the repetition and perpetuation of inadequate program designs and delivery systems."

To strengthen the evaluation process, the firm recommended that OEO take the following actions.

- Make clear assignments of evaluation responsibility.
- Provide, during the planning of training and technical assistance projects, for the evaluation of their impact on recipient agencies.
- Develop reliable evaluation methods and procedures.
- Focus evaluation on issues and factors identified in the planning and developing of training and technical assistance projects.
- Select competent evaluators.
- Follow up on the implementation of actions initiated on the basis of evaluation results.

The other consultant firm, in its report in August 1969, suggested certain preconditions necessary for making an evaluation of the impact of training services on recipients, as follows:

"Along with a clear definition of training and identification of the particular training experiences to be evaluated, specific training objectives would have to be determined, the content of the training known in advance, and systematic records of training and related activities would have to be kept for individuals, CAAs, and regions."

Although the June 1969 instruction and a similar one issued in June 1970 defined the evaluation responsibilities of OEO Headquarters and regional offices, these

instructions did not prescribe specific procedures for conducting evaluations, including such essential matters as the formation of evaluation teams, techniques for evaluating the services, and development of adequate evaluation designs.

In April 1971 the Deputy Director, Training and Technical Assistance Division, told us that, although his office recognized the need for more specific guidelines for the performance of evaluations, such guidelines would be developed following the development and implementation of acceptable planning, monitoring, and overall project management guidelines. In January 1972 we were told that no evaluation guidelines had been issued.

CHAPTER 4

CONCLUSIONS, RECOMMENDATIONS, AND AGENCY COMMENTS

CONCLUSIONS

The success of OEO's training and technical assistance program is dependent, to a large extent, on the adequacy of the planning for the services to be provided under the program. Improved planning of training and technical assistance services should help prevent the recurrence of those situations revealed by our review where services contracted for did not fully achieve their intended purposes. Although OEO has recognized the planning weaknesses revealed by our review and has established improved overall planning policies, further efforts are necessary to ensure that these policies are implemented effectively.

Improved monitoring of contract performance and evaluation of contract results are needed to ensure that full benefits will be obtained under OEO's contracts for training and technical assistance services and to correct such shortcomings in contract performance as those observed in our review. OEO has recognized the need for improved monitoring and for an evaluation system at both its headquarters and its regional offices. Although the necessary policies and organizational responsibilities appear to have been established, a need exists for specific implementing instructions so that the monitoring and evaluation functions can be carried out effectively.

RECOMMENDATIONS TO THE DIRECTOR, OEO

We recommend that OEO:

1. Issue guidelines specifying how improved planning for furnishing training and technical assistance should be accomplished. Such planning should include:

--Identifying antipoverty agencies' specific training and technical assistance needs.

--Ensuring that training and technical assistance services are provided timely and are relevant to

antipoverty agency needs by scheduling, to the extent possible in advance of the award of a contract, the times, places, nature, and duration of the services and by identifying the individuals to be provided with the services.

--Obtaining commitments from intended recipients that they will accept the services to be offered to them.

--Providing for closer communication and coordination, both within OEO and between OEO and the antipoverty agencies regarding the training and technical assistance services.

2. Monitor implementation of the planning guidelines and provide training to the officials assigned to carry out the planning responsibilities.

3. Provide for more effective monitoring of contractor performance under its training and technical assistance contracts by:

--Designating a project manager for each contract as soon as the need for the contract services has been established.

--Issuing specific guidelines for improving the monitoring and evaluation of training and technical assistance efforts and providing the officials responsible for these functions with the training they need to monitor contractor performance more effectively, evaluate benefits obtained, and use evaluation results effectively.

AGENCY COMMENTS

OEO, in commenting on a draft of this report by letter dated January 25, 1972 (see app. I), stated that OEO recognized the essential problems highlighted in our report and informed us that, as a result of our review as well as OEO's appraisal of the problems, it had taken or would take the following actions.

- Training and technical assistance contract activity had been greatly reduced. Funds had been allocated directly to the regional offices, together with the responsibility for planning, implementation, and utilization of the funds, which resulted in more direct and relevant training and technical assistance services to the antipoverty agencies.
- On an experimental basis, a program was started to grant training and technical assistance funds directly to antipoverty agencies. These grantees, in turn, either purchase their training and technical assistance services or use those funds to build training capability within their agencies. OEO believes that, with proper support services and direct monitoring, a more effective and relevant delivery of training and technical assistance services will be ensured and that irrelevant and unwanted services virtually will be eliminated.
- In July 1971 a task force was appointed to revise OEO instructions on grant and contract management. The revised instructions are to be issued as an official OEO policy, and relevant training will be provided to those responsible in regional and headquarters offices for its implementation.
- Workshops have been held for project managers of all training and technical assistance projects, which stressed the monitoring and evaluation skills necessary to ensure receptivity and relevance of the contract services to the agencies.
- Field representatives concerned with grants to antipoverty agencies for developing local training and technical assistance capability will receive a 2-day workshop on monitoring and evaluating training and technical assistance programs within their grantees.

Although OEO has embarked on its program for developing local training and technical assistance within antipoverty agencies, OEO stated that it still was essential that some training and technical assistance be delivered by way of contracts.

OFFICE OF ECONOMIC
OPPORTUNITY

EXECUTIVE OFFICE OF THE PRESIDENT
WASHINGTON, D.C. 20506

Date: JAN 25 1972
Reply to
Attn. of: 0

Subject: OEO Comments on GAO Draft Report on Improvements needed in the T&TA Services provided to Anti-Poverty Agencies by OEO

To: Henry Eschwege
Assistant Director
Civil Division
General Accounting Office

Having carefully reviewed the GAO Draft Report dated September 30, 1971, the Office of Economic Opportunity recognizes the essential problems highlighted in the report and noted both its basic recommendations and detailed comment.

As a result of prior GAO Draft Reports on Improvements needed in the training and technical assistance services provided by OEO to the Anti-Poverty Agencies as well as honest appraisal of the problems surrounding effective and helpful delivery of these services to the clientele, OEO has taken the following actions:

- I. Training and technical assistance contract activity has been greatly reduced both in Headquarters and the Regional Offices (See Attachment A). In addition Regional Office T&TA allocations have been made directly to the Regional Offices along with assigned responsibility for planning, implementation and utilization of that money given those offices. The immediate result is a more direct and clearly relevant provision by the Regions to their agencies of training and technical assistance services.

On an experimental basis - limited in FY'71 and, based on successful experiences expanded in FY'72 - OEO has embarked on a program of developing local training and technical assistance capability within the agencies. The expected result is that the past "irrelevant and unwanted" nature of training and technical assistance services will be virtually eliminated. Regional Offices have been granting the training and technical assistance dollars directly to the grantees upon receipt of a plan. These grantees in turn, either purchase their own training and technical assistance services directly and locally, or, use those funds to build training capability (staff, materials, etc.) within their own agency. OEO strongly feels that this action, with proper support services and direct monitoring, assures a more effective and relevant delivery of training and technical assistance services.

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APPENDIX II

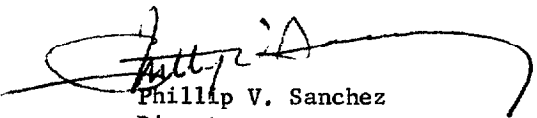
ii. As a result of preliminary draft reports from the GAO, OEO has taken additional positive action to improve the project management of the several training and technical assistance contracts:

- A. In July 1971 a Task Force was appointed to revise OEO Instructions in the 2610 series on grant and contract management procedures and policies. These instructions would apply to T & TA contracts. The draft of the Task Force Report is now under review and will be made OEO policy after completion of discussion and revision of the draft.

It is my intention to implement the revised 2610 set of Instructions both through its official issuance as OEO policy and by providing relevant training to those responsible in Regional and Headquarters Offices for its implementation.

- B. Further, because it is still essential that some training and technical assistance be delivered by way of contracts in-depth planning and training workshops on Project Management Art Skills have been held for Project Managers of all T & TA projects. (See attachment B) These workshops have stressed the monitoring and evaluation skills necessary to assure receptivity and relevance of the contract services to the agencies. Further, given the experimental nature of the T & TA local capability effort - each Regional Office - field representatives and others concerned with these grants will receive a two-day workshop on monitoring and evaluating training and technical assistance programs within their grantees. This is proposed for the last two quarters of FY 72.

With these actions either in place or planned, OEO feels it has moved responsibly and responsibly both to the agencies it serves and to the concerns indicated by the GAO, to assure that the training and technical assistance services will be genuinely helpful to those agencies in realizing their objectives and improving their efforts.



Phillip V. Sanchez
Director

GAO note: The attachments to the Director's letter have been considered in the preparation of our final report but have not been included here.

PRINCIPAL OFFICIALS OF THE
OFFICE OF ECONOMIC OPPORTUNITY
RESPONSIBLE FOR THE ACTIVITIES
DISCUSSED IN THIS REPORT

	Tenure of office	
	From	To
DIRECTOR:		
Phillip V. Sanchez	Sept. 1971	Present
Frank C. Carlucci	Dec. 1970	Sept. 1971
Donald Rumsfeld	May 1969	Dec. 1970
Bertrand M. Harding (acting)	Mar. 1968	May 1969
DEPUTY DIRECTOR:		
Wesley L. Hjernevik	Oct. 1969	Present
Robert Perrin (acting)	Mar. 1968	Oct. 1969
Bertrand M. Harding	June 1966	Mar. 1968
ASSISTANT-ASSOCIATE DIRECTOR FOR ADMINISTRATION (note a):		
Ernest Russell (acting)	Apr. 1971	Present
Robert C. Cassidy	Sept. 1967	Apr. 1971
ASSISTANT DIRECTOR FOR OPERATIONS:		
Roy E. Batchelor	Nov. 1971	Present
H. Rodger Betts (acting)	Sept. 1971	Nov. 1971
Phillip V. Sanchez	Feb. 1971	Sept. 1971
Donald I. Wortman (acting)	Dec. 1970	Feb. 1971
Frank C. Carlucci	Dec. 1969	Dec. 1970
William Bozman (acting)	Oct. 1969	Dec. 1969
Theodore M. Berry (Community Action Program) (note b)	Apr. 1965	Sept. 1969

^aThe Office of Administration was called Office of Management until June 1968.

^bIn September 1969 the community action program position was terminated as an organizational entity and responsibility for the programs was shifted to the Office of Program Development and the Office of Operations, newly created offices.

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