

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

**JOBS MONITORING AND
TECHNICAL ASSISTANCE:
HEADQUARTERS' ROLE**



AUGUST 1993

OFFICE OF INSPECTOR GENERAL

The mission of the Office of Inspector General (OIG), as mandated by Public Law 95-452, as amended, is to protect the integrity of the Department of Health and Human Services' (HHS) programs as well as the health and welfare of beneficiaries served by those programs. This statutory mission is carried out through a nationwide network of audits, investigations, and inspections conducted by three OIG operating components: the Office of Audit Services, the Office of Investigations, and the Office of Evaluation and Inspections. The OIG also informs the Secretary of HHS of program and management problems and recommends courses to correct them.

OFFICE OF AUDIT SERVICES

The OIG's Office of Audit Services (OAS) provides all auditing services for HHS, either by conducting audits with its own audit resources or by overseeing audit work done by others. Audits examine the performance of HHS programs and/or its grantees and contractors in carrying out their respective responsibilities and are intended to provide independent assessments of HHS programs and operations in order to reduce waste, abuse, and mismanagement and to promote economy and efficiency throughout the Department.

OFFICE OF INVESTIGATIONS

The OIG's Office of Investigations (OI) conducts criminal, civil, and administrative investigations of allegations of wrongdoing in HHS programs or to HHS beneficiaries and of unjust enrichment by providers. The investigative efforts of OI lead to criminal convictions, administrative sanctions, or civil money penalties. The OI also oversees State Medicaid fraud control units which investigate and prosecute fraud and patient abuse in the Medicaid program.

OFFICE OF EVALUATION AND INSPECTIONS

The OIG's Office of Evaluation and Inspections (OEI) conducts short-term management and program evaluations (called inspections) that focus on issues of concern to the Department, the Congress, and the public. The findings and recommendations contained in these inspection reports generate rapid, accurate, and up-to-date information on the efficiency, vulnerability, and effectiveness of departmental programs. This report was prepared in the Kansas City regional office under the direction of James H. Wolf, Regional Inspector General. Project staff:

REGION

Hugh Owens, Project Leader
Perry A. Seaton
Hope Hartshorn

HEADQUARTERS

Ruth Folchman
Mark Krushat

For additional copies of this report, please contact the Kansas City Regional Office at (816) 426-5959.

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

**JOBS MONITORING AND
TECHNICAL ASSISTANCE:
HEADQUARTERS' ROLE**



AUGUST 1993 OEI-07-92-00380

EXECUTIVE SUMMARY

PURPOSE

To evaluate the policies and procedures established by the Administration for Children and Families (ACF) Headquarters for monitoring and providing technical assistance to States for the Job Opportunities and Basic Skills Training (JOBS) program.

BACKGROUND

The Family Support Act of 1988, Public Law 100-485, created the JOBS program for recipients of Aid to Families with Dependent Children (AFDC). It establishes a comprehensive framework and programmatic structure for Federal and State efforts to help welfare recipients become self sufficient. Included are provisions related to job skills training, education, job readiness activities, job placement/job development, child care, transportation, and other supportive services.

The ACF monitors States' JOBS programs and provides them with policy and procedural guidance. The ACF Headquarters develops guidance and provides some technical assistance for regions and States. It also directs and oversees the technical assistance contract. The regional offices serve as the principal point of contact for the States. In this role, they monitor JOBS program operations, review and approve State Plans, and provide technical assistance to States.

METHODOLOGY

In recognition of the differing roles and responsibilities of ACF Headquarters and regional office components, we are reviewing ACF oversight of the JOBS program in two phases. Phase one, which is completed, involved a review of ACF Headquarters. Phase two, currently in progress, will review ACF regional offices and State agencies.

In phase one, we researched the legislative history of the JOBS program by reviewing the Federal law and regulations and relevant background material. In addition, we reviewed the written policies, processes, and products developed by ACF Headquarters for monitoring and providing technical assistance in the JOBS program. We conducted an on-site visit at ACF Headquarters and interviewed members of the Agency's staff responsible for the following key areas: field reviews, on-site visits, State Plans, data collection, and the technical assistance contract. We also interviewed members of Washington, D.C.-based advocacy organizations that have an active interest in the JOBS program.

FINDINGS

The ACF and the States faced a number of challenges in implementing the JOBS program. This program requires active coordination between the Department of Health and Human Services (HHS), the Department of Education, and the Department of Labor. The States had varying levels of experience in administering a job training program for AFDC recipients. In addition, ACF and the States had limited resources and funding available. Furthermore, the program went into effect less than one year after enactment, leaving ACF and the States very little lead time for implementation.

Despite these challenges, ACF released the final regulations within the one year time period mandated by Congress. In addition, it provided guidance and technical assistance to the States.

We recognize these efforts and the extraordinarily difficult circumstances under which ACF labored. We also realize that we do not have a complete picture of ACF activities since we have not completed phase two of the study. Nevertheless, we identified some weaknesses which we believe merit immediate attention. We offer findings and recommendations regarding improvements that need to be made now that the flurry of initial implementation is over and the JOBS program is beginning to stabilize and mature. These are in the areas of monitoring, technical assistance, program guidance, and management information.

MONITORING

The ACF Headquarters' guidance for field reviews and data collection has been inadequate.

The ACF conducted field reviews to obtain information on States' activities during the first two years of program implementation. However, we found that review guides were not released timely to the regions and field review reports were not released timely to the States. The ACF Headquarters has not issued guidance to the regional offices to provide the States with a comment period prior to the release of final field review reports; to require States to submit corrective action plans; or to require regional offices to follow-up with States on field review findings and recommendations.

Reviews in FY's 1990 and 1991 examined supportive services, child care, data collection and systems as well as JOBS. However, ACF has not used the field review process to monitor the States for compliance with their State Plans. It felt that it was inappropriate to do so during the early stages of implementation when it was more important to simply get a feel for what was happening at the State level and ensure that instructions and guidance were understood. Now that this stage is over, however, we believe that a more systematic method of compliance monitoring is needed.

With respect to data collection, we found that ACF has not established a closure date for the submission of States' data and is not receiving State data timely.

TECHNICAL ASSISTANCE

The ACF did not reap the full benefits that could have been obtained from the technical assistance contractors.

The ACF chose to use contractors to provide technical assistance to the States. While these contractors did provide valuable training and assistance, they did not address all of the subjects requested by the States, and some of the materials were not disseminated timely or to all the appropriate audiences.

PROGRAM GUIDANCE

Some action transmittals and information memoranda were not disseminated in a timely fashion.

MANAGEMENT INFORMATION

The ACF Headquarters has not systematically validated or analyzed information from field reviews, State Plans, and data collection systems; nor has it routinely disseminated management information to Congress, Federal and State managers, policy makers, and advocacy groups.

RECOMMENDATIONS

Specifically, to address the problems identified above, ACF should:

develop adequate processes to monitor States for compliance with their State Plans and JOBS program requirements;

review and clarify the purpose of existing monitoring initiatives and strengthen the policies and procedures guiding their administration;

In particular, with respect to field reviews:

- provide field review guides to the regional offices by the second quarter of the fiscal year to allow sufficient lead time to schedule, conduct, and complete these reviews;
- ensure that field review reports to the States are prepared and released in draft for their comment within 90 days of the field review visit;

- provide guidance to the regional offices on requiring States to submit corrective action plans to address problem areas identified during field reviews; and
- provide guidance to the regional offices to ensure that problem areas identified in the field reviews are being corrected.

With respect to data collection:

- continue to work closely with regional offices and the States to ensure the accurate, timely, and complete submission of data; and
- establish deadlines for the correction and finalization of States' data.

systematically reassess the specific needs of States for technical assistance and provide a timely and appropriate response;

ensure that action transmittals and information memoranda conform with Federal law and regulations and Agency policies;

allow 60 to 90 days lead time, whenever possible, for the effective dates of action transmittals and information memoranda;

develop a systematic analysis plan for JOBS program information available from field reviews, State Plans, and data collection systems; and

disseminate program information and data analysis through timely reports on varied program elements to Federal and State managers and policy makers.

AGENCY COMMENTS AND OIG RESPONSE

The ACF has agreed with most of our recommendations and has outlined specific actions it has planned or already taken to implement them. Their one major reservation concerns monitoring. They believe that it would be prudent to delay a final decision on these findings and recommendations until the second phase of the inspection--Regional Offices and States' Perspectives--has been completed.

We continue to believe that our findings and recommendations represent concerns that should be addressed in Headquarter's operation of the JOBS program. Nevertheless, we accept ACF's suggestion to delay final action on monitoring until the second phase of our study is done.

The ACF also expressed concerns about some of our findings and wished to emphasize numerous positive actions they have taken on matters addressed in our report. We wish to emphasize that we agree that ACF has taken aggressive action to implement the JOBS program. We highlighted this in the Executive Summary and in

the introduction to our findings. We have provided some additional examples of their actions in this final version of the report. Space and presentation style simply do not allow us to enumerate everything which ACF has done. For more examples, we invite the reader to read ACF comments, which are provided verbatim in Appendix D. However, it should be noted that the purpose of this report was to point out areas needing further attention. Such areas for improvement inevitably arise no matter how intensively management attempts to deal with complex problems.

We made other modifications to the report in response to ACF's comments. Again, the full text of their comments is contained in Appendix D.

We understand that ACF has recently established several task forces, one of which is to address monitoring and technical assistance. We believe that this is a positive step and hope that the information in this report will be useful to the task force addressing these functional areas.

TABLE OF CONTENTS

	PAGE
EXECUTIVE SUMMARY	
INTRODUCTION	1
FINDINGS	4
• Monitoring	4
• Technical Assistance	9
• Program Guidance	11
• Management Information	12
RECOMMENDATIONS	14
APPENDICES	
A: Fiscal Years 1990 - 1991 Field Reviews	A-1
B: Submission of Quarterly Participation Rate Statistical Report (FSA-103) For FY's 1991 - 1992	B-1
C: Delayed Action Transmittals	C-1
D: Agency Comments	D-1

INTRODUCTION

PURPOSE

To evaluate the policies and procedures established by the Administration for Children and Families (ACF) Headquarters for monitoring and providing technical assistance to States for the Job Opportunities and Basic Skills Training (JOBS) program.

BACKGROUND

The JOBS Program

The Family Support Act of 1988, Public Law 100-485, created the JOBS program for recipients of Aid to Families with Dependent Children (AFDC). Its purpose is to promote the self sufficiency of welfare recipients through a broad range of employment, training, education, and support services. The States must offer job skills training, education, job readiness activities, job placement/job development, child care, transportation, and other supportive services. They must also offer at least two of the following optional services: job search, on-the-job training, work supplementation, or community work experience. Educational services include high school or equivalent education, basic and remedial education to achieve a basic literacy level, and education for individuals with limited English proficiency.

The Challenges of Program Implementation

The JOBS program is markedly different from its predecessors. The ACF and the States faced a number of challenges in implementing it.

The program, administered by ACF, requires active coordination among the Department of Health and Human Services (HHS), the Department of Education, and the Department of Labor.

The States had varying levels of experience in administering a job training program for AFDC recipients. Some of the States had existing job training programs which they had to convert to meet the JOBS program requirements, which included education as a component. Others had little or no recent experience in administering an education and job training program for welfare recipients. Some States were required to create new systems or to re-design their existing systems during the period when systems and data collection rules and policies were being formulated. Overall, ACF and the States had limited resources and funding available.

Under the legislation, States could implement their program as early as July 1, 1989 or as late as October 1, 1990. Fifteen States elected to start on July 1, 1989, prior to the issuance of the final regulations. Even those who chose to wait had at most two years

after enactment of the law to implement their programs. Thus, ACF and the States had very little lead time. Despite these challenges, ACF released the final JOBS regulations within the one year time period mandated by Congress.

ACF Headquarters and Regional Office Oversight Responsibilities

The ACF monitors States' JOBS programs and provides them with policy and procedural guidance. The ACF Headquarters develops guidance for and directs the nationwide administration of the JOBS program. It provides some direct technical assistance to regions and States and oversees the technical assistance contract.

The ACF regional offices serve as the principal point of contact for the States. They monitor JOBS program operations and review and approve State Plans. They also are responsible for providing some technical assistance. The roles and responsibilities of ACF Headquarters and regional offices are explained in greater detail in the August 27, 1991 edition of the **Federal Register** (56 FR 42332 No. 166) under ACF Functions and Delegations of Authority.

METHODOLOGY

In recognition of the differing roles and responsibilities of ACF Headquarters and regional office components, we decided to review the JOBS program in two phases. We did this to more accurately reflect the overall performance of each component in providing monitoring and technical assistance for the JOBS program.

Phase one, which is completed, involved a review of ACF Headquarters. Phase two, currently in progress, will review ACF regional offices and State agencies involved in the JOBS program. Our review of ACF regional offices will focus on their roles and responsibilities in monitoring the JOBS program and providing technical assistance to States. Our review of the States will focus on their perspectives of the monitoring and technical assistance received from ACF.

In phase one, we researched the legislative history of the JOBS program by reviewing the Federal law, regulations, and relevant background material. In addition, we reviewed the policies, processes, and products developed by ACF Headquarters for monitoring and providing technical assistance in the JOBS program. This included a review of: manuals, transmittals, and memoranda; field review documentation; statistical data reported by the States; analyzed data; and contract/performance indicators for the technical assistance contractors.

We examined ACF Headquarters' role in monitoring and providing technical assistance to regional offices and States for the JOBS program. We conducted an on-site visit at ACF Headquarters and interviewed members of the Agency's staff responsible for the following key areas: field reviews, on-site visits, State Plans, data collection, and the technical assistance contract. We interviewed staff from the office of the Assistant Secretary for Planning and Evaluation. We also interviewed members

of Washington, D.C.-based advocacy organizations that have an active interest in the JOBS program. These included the National Governors' Association, the American Public Welfare Association, and the Center for Law and Social Policy.

Our review was conducted in accordance with the *Quality Standards for Inspections* issued by the President's Council on Integrity and Efficiency.

FINDINGS

The complexity of the JOBS program, the traditional difficulties that accompany implementation of a new program, and the budget constraints that are a mainstay in today's economy make administering the JOBS program a constant challenge. We recognize the extraordinarily difficult circumstances under which ACF Headquarters labored and are well aware of its success in getting the complex regulations issued timely and of the various forms of technical assistance and guidance which it provided to the States, either directly or through its regional offices. We realize that we do not have a complete picture of ACF activities since we have not completed phase two.

Nevertheless, we identified weaknesses in national guidance and oversight which we believe merit immediate attention. We offer findings and recommendations regarding improvements that need to be made now that the flurry of initial implementation is over and the JOBS program is beginning to stabilize and mature. These weaknesses are in the areas of monitoring, technical assistance, program guidance, and management information.

MONITORING

The ACF Headquarters' guidance for field reviews and data collection has been inadequate.

The ACF performs the monitoring function of the States primarily through on-site field reviews. These are conducted by teams composed of ACF Headquarters and regional office personnel. Monitoring is also performed through analysis of data that States submit to ACF Headquarters and regional offices.

Field reviews

The ACF conducted field reviews of 13 States in Fiscal Year (FY) 1990 and of the remaining States in FY 1991. These reviews covered child care, supportive services, systems, and data collection as well as JOBS. In FY 1992, ACF conducted field reviews covering the program operations of 18 States. The principal focus of these reviews was to describe and evaluate significant changes in program operations and to obtain a sense of client flow through the JOBS program since the previous review. According to ACF staff responsible for field reviews, "interesting practices" identified in the field review process are shared with the regions and States. However, we did find some problems with the reviews.

- *Field review guides were not released timely to the regions.*

The final field review guides for both FY 1991 and FY 1992 were released in late spring, which limited the time available for the regions to conduct and complete required field review activities.

An ACF work group convened in February 1992 for the purpose of designing the field review guide for FY 1992. A draft version of this guide was provided to the regions in March 1992. The final field review guide was released in June 1992. The ACF Headquarters stated that regions had the option of using the draft guide to conduct their field reviews. However, many regions deferred their field reviews until after the issuance of the final field review guide.

The field review guides for FY 1993 were released in draft to the regions in December 1992. As of February 2, 1993, these had not been released in final.

- *Field review reports were not released timely to the States.*

The ACF Headquarters has not established uniform national time limits for the preparation and release of field review reports. In FY 1991, the average elapsed time from the field review visit to the release of the field review reports was over seven months. Two field review reports were released after 17 months. At the time of our review in September 1992, 6 States had not received their FY 1991 field review reports, a time lapse of more than 12 months. By February 1993, ACF had released four of these FY 1991 reports. The two outstanding FY 1991 field review reports were for Kansas and Nebraska. This delay adversely affects the usefulness of these reports to States. (Appendix A has a complete listing of field reviews conducted and the report status for FY's 1990 - 1991).

At the time of our review in September 1992, no final FY 1992 field review reports had been released.

The ACF Headquarters does not have readily available the dates that regional offices release final field review reports. The ACF Headquarters' staff stated that, under the Agency's decentralized structure, Regional Administrators are responsible for the final approval and release of these reports.

- *Regional offices were not directed to provide the States with a comment period prior to the release of final field review reports.*

The ACF Headquarters has not provided guidance to the regional offices on releasing draft reports to the States for their review and comment. Under ACF's decentralized structure, final field review reports are released by ACF Regional Administrators upon completion of ACF Headquarter's internal review of the report content for "accuracy and sensitivity." The ACF staff informed us that States have the opportunity to comment on final reports. However, ACF does not solicit these comments.

- *Regional offices were not directed to require States to submit corrective action plans.*

The ACF Headquarters has not provided guidance to the regional offices on State submittal of corrective action plans. The field review process has identified problem areas which merit States' attention. Currently, there are no legal, regulatory, or Agency policies which require the States to respond to these problem areas.

- *Regional offices were not directed to follow-up with States on field review findings and recommendations.*

The ACF Headquarters does not require the regional offices to follow-up with States to determine if they have addressed the problems or weaknesses identified in the field review process. Some regional offices may conduct follow-up as part of their overall JOBS program oversight, but there is no assurance that this will be done timely or even done at all.

- *The regions were not directed to use the field review process to monitor the States for compliance with their State Plans.*

Field review guides, which are the primary means of monitoring JOBS, do not specifically address the review of the States' and political subdivisions' compliance with State Plan provisions. Field reviews are for "fact finding" purposes and are not used as a monitoring tool for compliance. However, when the review team identified problem areas while conducting past field reviews, the issues were often included in the field review report.

The ACF staff felt it was inappropriate to monitor for compliance during the early stages of implementation when it was more important to understand what was happening at the State level and ensure that instructions and guidance were understood. Now that this stage is over, however, we believe a more systematic method of compliance monitoring is needed.

Data collection

States are required by law, regulation, or administrative guidance (in the form of "action transmittals") to submit data to ACF on various aspects of the JOBS program. However, there are no penalty mechanisms to enforce JOBS program reporting requirements. The ACF Headquarters' staff stated that the Agency is applying "gentle pressure" on the States to get them to comply with all reporting requirements. The regional offices contact those States that are having difficulty meeting the deadlines for data submission. Once these States have been contacted, the regional offices offer assistance and guidance, if necessary, to ensure timely submission of data. The ACF Headquarters data branch is responsible for providing technical assistance in this area.

- *The ACF is not receiving State data timely.*

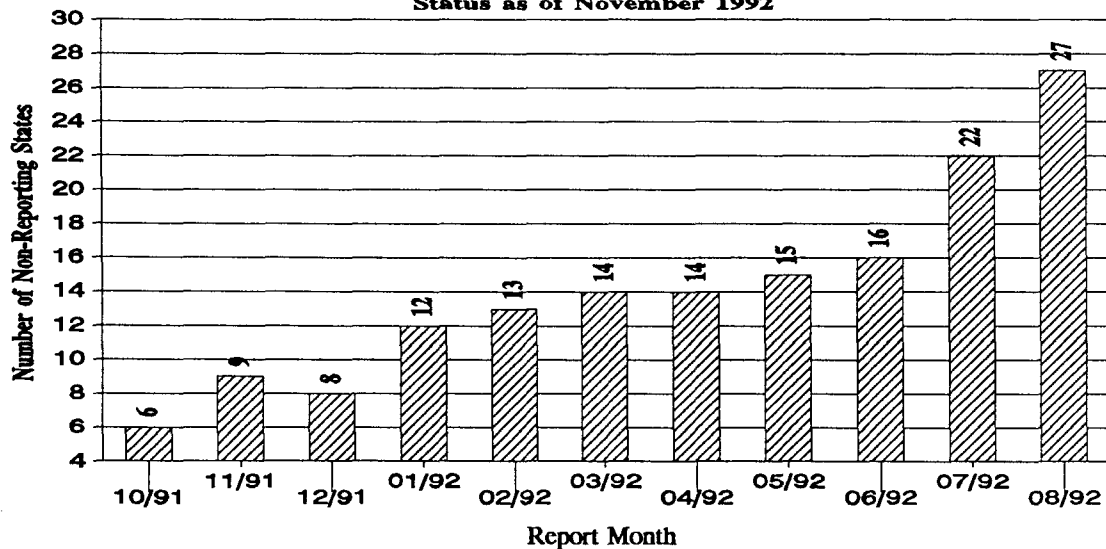
Quarterly Participation Rate Statistical Report (FSA-103)

Action Transmittal 90-11 provided conflicting instructions concerning the dates that the Quarterly Participation Rate Statistical Reports (FSA-103) are due in ACF Headquarters and regional offices. To compensate for conflicting due dates, we allowed a 30-day grace period from the specific dates mentioned in the action transmittal when determining the timeliness of these reports. Even with this allowance, over one third of the States and political subdivisions have not consistently submitted Quarterly Participation Rate Statistical Reports (FSA-103) timely in FY 1991 and FY 1992 (Appendix B).

JOBS Program Participation Data Collection Information (FSA-108)

All States and political subdivisions are required to electronically submit the monthly JOBS Program Participation Data Collection Information (FSA-108). The first submission was due by December 15, 1991 for the sample month of October 1991. The *Code of Federal Regulations [45 CFR 250.80(a)(1)]*, requires States and political subdivisions to electronically submit data no later than 45 days after the end of the sample month. Action Transmittal 91-17 improperly extended the submission due date for the JOBS Program Participation Data Collection Information (FSA-108) report to 60 days. However, some States are not meeting either time frame for the submission of JOBS Program Participation Data Collection Information (FSA-108) reports (Chart 1).

Chart 1
The Number of States Not Reporting FSA-108 Data
for October 1991 - August 1992
 Status as of November 1992



November 1992 data furnished by ACF Headquarters established that of the 50 States and the District of Columbia:

- Six (Delaware, Minnesota, Missouri, Nebraska, New Hampshire, and Pennsylvania) had not electronically submitted any of the JOBS Program Participation Data Collection Information (FSA-108) to ACF Headquarters;
- Seven (Alabama, Connecticut, Indiana, Ohio, Rhode Island, Tennessee, and West Virginia) were 7 to 11 months late submitting some or all of their reports;
- Three (District of Columbia, Montana, and South Dakota) were four to six months late submitting some or all of their reports;
- Eight (California, Georgia, Kansas, Maryland, Michigan, New Jersey, New York, and Oklahoma) were up to three months late submitting some or all of their reports;
- Three (Illinois, Massachusetts, and Mississippi) had submitted data for all periods except the most recent report month (August 1992); and
- The remaining 24 were current with their data reports.

Implementation of Quarterly Report of Title IV-F Expenditures Uniform Reporting Requirements (ACF-332)

According to one ACF report, 24 States were late submitting Implementation of Quarterly Report of Title IV-F Expenditures, Uniform Reporting Requirements (ACF-332) reports for the first and/or second quarter of FY 1992.

Child Care Reporting Requirements (ACF-115)

Based upon information contained in an ACF report, 33 States were late submitting Implementation of Child Care Reporting Requirements (ACF-115) reports for the first and/or second quarter of FY 1992.

- ***The ACF Headquarters has not established a closure date for the submission of States' data.***

Data for the implementation of Quarterly Participation Rate Statistical Report (FSA-103) is due on a quarterly basis. The data that was due for the first quarter of 1991 (in February 1991) was still being revised by some States in April 1992. The data that was due for the first quarter of 1992 (in February 1992) was still being revised by some States in August of 1992 (Appendix B).

Data for the JOBS Program Participation Data Collection Information (FSA-108) is due 60 days after the sample month. Four States submitted revisions to the October 1991 data in August 1992, eight months after the report due date.

Additional discussion of matters related to data collection are contained in the Program Guidance and Management Information sections that appear later in this report.

TECHNICAL ASSISTANCE

The ACF provided technical assistance and training to regional office staff through conferences held in FY's 1989, 1991, and 1992. Shortly after the publication of the final regulations in the Fall of 1989, ACF held a major conference for over 700 Federal, State, and Tribal officials to provide operational and policy guidance for the JOBS program. In addition, ACF Headquarters' staff visited every region in the summer of 1990 to train staff on reviewing State Plans, provided pre-printed guides of the State Plan to the States, and issued numerous action transmittals and information memoranda. Further, ACF Headquarters retained technical assistance contractors specifically for the purpose of providing technical assistance and guidance to the States.

The field reviews and States' data were used to identify technical assistance needs. The HHS, in conjunction with the Departments of Labor and Education, provide technical assistance primarily through the use of contractors. In 1990, the three Departments entered into a three year, six million dollar technical assistance contract with the National Alliance of Business, Maximus, and Pelavin Associates to help States and localities operate effective and efficient JOBS programs. Contract funding is apportioned among the three. All deliverables developed by the technical assistance contractors had to be reviewed and cleared by the three Departments before being distributed to States.

The ACF awarded the technical assistance contract in August 1990. The contract was written to be an "evolving contract to address States' needs." A November 1990 memo to ACF Regional Administrators spelled out the three tasks assigned to the technical assistance contractors. These tasks were: assistance to program managers, assistance to providers, and systems assessment and information dissemination. After consultation with the Departments of Labor and Education, the first two tasks were modified to reflect the following priority areas: program design, coordination, marketing, and agency cultural/structural change.

The ACF did not reap the full benefits that could have been obtained from the technical assistance contractors.

As indicated above, ACF and the technical assistance contractors initiated important and useful training and guidance. However, the full potential of available resources was not realized.

- *The technical assistance contractors did not address the four priority areas timely.*

The contractors were to focus on the four priority areas listed above for the first six to nine months of their contract. Additional areas were to be covered in subsequent years. As shown below, the contractors did not cover all four of these priority areas during the first year of their contract. The only additional area that has been addressed is literacy.

One of the four priority areas was addressed in FY 1991, when the technical assistance contractors conducted six regional workshops on program design. The remaining priority areas that were to be covered in the first six to nine months of the contract were not addressed until FY 1992. This was accomplished through five regional workshops covering coordination, management, and agency cultural change; three regional workshops on marketing; and a national training conference on agency cultural change.

- *The technical assistance contractors did not address all of the subjects the States requested.*

As noted above, the contractors were to provide technical assistance in addition to the four priority areas. Therefore, they queried the States in FY 1990 and FY 1991 to determine the States' training needs. The States responded that they needed technical assistance in the areas of child care, teen parents, systems, and data.

The ACF Headquarters' Project Officer responsible for the technical assistance contract stated that the technical assistance contractors did act as facilitators for a session on child care for Federal staff. However, the contractors provided no training for the States on the subject. The ACF purposely elected to address child care rather than have the contractors do it. One means of addressing this was through a child care conference held in December 1992.

With respect to teen parents, the contractors devoted one session to this topic during the Program and Component Design workshops held in FY 1991. Beyond this, ACF indicates it addressed teen parents through the field review process, specific policy guidance, and other means.

The Project Officer considered systems and data training to be a responsibility of ACF Systems and Data branches since Agency expertise was available. Therefore, the contractors did not conduct this training.

The contractors had very little involvement in providing technical assistance for these areas as ACF chose to address three of the four on their own. However, the contractors have scheduled additional workshops and on-site forums for FY 1993 that relate to literacy.

- *The technical assistance materials were not disseminated effectively. This limited their usefulness to States.*

The technical assistance contractors sent a memorandum to State agencies in December of 1990 stating that they were working on a General Systems Design for the JOBS Automated System and a Data Element Dictionary. At that time, while all States had implemented their JOBS program, several States were continuing to design and implement their JOBS reporting and data systems. The General Systems Design and Data Element Dictionary were not published and distributed to all States until August 1991.

In May of 1991, the contractors promised that a Coordination Handbook would be completed by the end of the year. This handbook was designed to facilitate the coordination between Federal, State, and local entities involved in the JOBS program. The Coordination Handbook was not distributed until November 1992.

The technical assistance contractors have concentrated most of their efforts on the development of technical assistance workshops and workshop materials. The handouts and workbooks developed for the workshops were given to all attendees. Personnel from non-attending States could request copies of the workshop materials. However, ACF did not routinely send this material to non-attendees, due to the expense to the agency and because non-attendees may not have been able to fully understand and utilize the information without the workshop presentations.

PROGRAM GUIDANCE

Given the magnitude of the implementation requirements and the fact that States had the option to begin JOBS programs within the first year, ACF faced a formidable task in issuing the necessary guidelines to them. It did issue the implementing regulations within one year. The ACF also used action transmittals and information memoranda to communicate Agency policies, procedures, and requirements to regions and States. To its credit, 42 of the 53 action transmittals and information memoranda we reviewed were disseminated in a timely fashion. However, we did identify some weaknesses in this area.

Some action transmittals and information memoranda were not disseminated in a timely fashion.

Appendix C lists eleven action transmittals which were issued close to or after their effective date. Most of these relate to systems and data reporting, critical aspects of program implementation. The delays in issuing the transmittals gave the States and political subdivisions very little lead time to undertake the complex task of revising their computer systems and begin capturing data.

In addition, as we noted in the earlier section on data collection, an Action Transmittal (AT-91-17), improperly extended the submission due date for the JOBS Program Participation Data Collection Information (FSA-108) to 60 days. This is contrary to the Federal Regulations which require States and political subdivisions to electronically submit data no later than 45 days after the end of the sample month [45 CFR 250.80(a)(1)].

MANAGEMENT INFORMATION

The ACF Headquarters has not systematically validated or analyzed information from field reviews, State Plans, and data collection systems; nor has it routinely disseminated management information to Congress, Federal and State managers, policy makers, and advocacy groups.

The ACF Headquarters has worked with the States to develop several information initiatives. However, we found weaknesses both with the data itself and with the use being made of it.

- ***The ACF Headquarters has not adequately validated and analyzed information submitted by the States.***

The ACF Headquarters utilizes several means of analyzing information submitted by the States. Computer edits point out coding and transmission errors in State data. Consistency checks are used to compare total fields with information contained in the data elements to ensure uniformity. Acceptable ranges for data are established based upon historical data parameters that the States previously reported. The FY 1992 field review process involved reviewing a sample of case files against JOBS Program Participation Data Collection Information (FSA-108). However, while the field review process does validate case file information from one or two County offices within a State against the data submitted by that office, the review is too limited in scope (less than 100 cases total at two sites) to adequately determine if States' data is accurate. It should also be noted that the FY 1992 field reviews were conducted in less than half of the States.

- *The ACF Headquarters has not routinely disseminated management information in a useful format to those who need it.*

Management information has not been made routinely available to Federal and State managers, policy makers, the Congress, and advocacy groups. Agency products, such as summary statistical reports on participation, outcomes, characteristics of State Plans, demographic information about participants, and "interesting practices" are useful to Congress, HHS components, ACF Headquarters/regional offices, States, and advocacy groups in their research and planning activities. This information has not been widely disseminated within and outside the Department.

RECOMMENDATIONS

As indicated in the background and findings sections, we recognize the difficulties faced by ACF and its success in issuing the implementing regulations and providing the initial structure for monitoring the program. Nevertheless, we believe that certain improvements, which are the responsibility of ACF Headquarters, require immediate attention.

Specifically, to address the problems identified above, ACF should:

develop adequate processes to monitor States for compliance with their State Plans and JOBS program requirements;

review and clarify the purpose of existing monitoring initiatives and strengthen the policies and procedures guiding their administration;

In particular, with respect to field reviews:

- provide field review guides to the regional offices by the second quarter of the fiscal year to allow sufficient lead time to schedule, conduct, and complete these reviews;
- ensure that field review reports to the States are prepared and released in draft for their comment within 90 days of the field review visit;
- provide guidance to the regional offices on requiring States to submit corrective action plans to address problem areas identified during field reviews; and
- provide guidance to the regional offices to ensure that problem areas identified in the field reviews are being corrected.

With respect to data collection:

- continue to work closely with regional offices and States to ensure the accurate, timely, and complete submission of data; and
- establish deadlines for the correction and finalization of States' data.

systematically reassess the specific needs of the States for technical assistance and provide a timely and appropriate response;

ensure that action transmittals and information memoranda conform with Federal law and regulations and Agency policies;

allow 60 to 90 days lead time, whenever possible, for the effective dates of action transmittals and information memoranda;

develop a systematic analysis plan for JOBS program information available from field reviews, State Plans, and data collection systems; and

disseminate program information and data analysis through timely reports on varied program elements to Federal and State managers and policy makers.

AGENCY COMMENTS AND OIG RESPONSE

The ACF has agreed with most of our recommendations and has outlined specific actions it has planned or already taken to implement them. Their one major reservation concerns monitoring. They believe that it would be prudent to delay a final decision on these findings and recommendations until the second phase of the inspection--Regional Offices and States' Perspectives--has been completed.

We continue to believe that our findings and recommendations represent concerns that should be addressed in Headquarter's operation of the JOBS program. Nevertheless, we accept ACF's suggestion to delay final action on monitoring until the second phase of our study is done.

The ACF also expressed concerns about some of our findings and wished to emphasize numerous positive actions they have taken on matters addressed in our report. We wish to emphasize that we agree that ACF has taken aggressive action to implement the JOBS program. We highlighted this in the Executive Summary and in the introduction to our findings. We have provided some additional examples of their actions in this final version of the report. Space and presentation style simply do not allow us to enumerate everything which ACF has done. For more examples, we invite the reader to read ACF comments, which are provided verbatim in Appendix D. However, it should be noted that the purpose of this report was to point out areas needing further attention. Such areas for improvement inevitably arise no matter how intensively management attempts to deal with complex problems.

We made other modifications to the report in response to ACF's comments. Again, the full text of their comments is contained in Appendix D.

We understand that ACF has recently established several task forces, one of which is to address monitoring and technical assistance. We believe that this is a positive step and hope that the information in this report will be useful to the task force addressing these functional areas.

APPENDIX A

FISCAL YEARS 1990 - 1991 FIELD REVIEWS			
State Reviewed	MO/YR of Review	Date Field Review Report Released	Elapsed Time from Field Review
Region I--Boston			
Connecticut	05/91	09/91	4 months
Maine	04/91	08/91	4 months
Massachusetts	03/91	06/91	3 months
New Hampshire	03/91	06/91	3 months
Rhode Island	07/90	12/90	5 months
Vermont	06/91	10/91	4 months
Region II--New York			
New Jersey	03/91	10/91	7 months
New York	08/91	01/93	17 months
Region III--Philadelphia			
Delaware	03/91	10/91	7 months
District of Columbia	02/91	10/91	8 months
Maryland	04/91	02/92	10 months
Pennsylvania	09/91	07/92	10 months
Virginia	08/91	04/92	8 months
West Virginia	09/91	06/92	9 months
Region IV--Atlanta			
Alabama	04/91	07/91	3 months
Florida	02/91	05/91	3 months
Georgia	10/90	01/91	3 months
Kentucky	09/91	01/92	4 months
Mississippi	06/91	09/91	3 months
North Carolina	09/91	03/92	6 months
South Carolina	04/91	07/91	3 months

FISCAL YEARS 1990 - 1991 FIELD REVIEWS			
State Reviewed	MO/YR of Review	Date Field Review Report Released	Elapsed Time from Field Review
Region IV--Atlanta (Continued)			
Tennessee	05/91	10/91	5 months
Region V--Chicago			
Illinois	07/91	09/92	14 months
Indiana	09/91	10/92	13 months
Michigan	09/91	09/92	12 months
Minnesota	08/90	11/90	3 months
Ohio	06/91	09/92	15 months
Wisconsin	08/90	12/90	4 months
Region VI--Dallas			
Arkansas	03/91	05/91	2 months
Louisiana	08/91	01/92	5 months
New Mexico	06/91	09/91	3 months
Oklahoma	09/90	03/91	6 months
Texas	09/91	12/91	3 months
Region VII--Kansas City			
Iowa	09/90	04/91	7 months
Kansas	06/91	Not Released ¹	19 + months ¹
Missouri	08/91	01/93	17 months
Nebraska	09/91	Not Released ¹	16 + months ¹
Region VIII--Denver			
Colorado	08/90	01/91	5 months
Montana	07/91	02/92	7 months
North Dakota	07/91	12/91	5 months
South Dakota	04/91	10/91	6 months
Utah	03/91	10/91	7 months
Wyoming	09/91	05/92	8 months

FISCAL YEARS 1990 - 1991 FIELD REVIEWS			
State Reviewed	MO/YR of Review	Date Field Review Report Released	Elapsed Time from Field Review
Region IX--San Francisco			
Arizona	03/91	05/91	2 months
California	08/90	11/90	3 months
Hawaii	07/91	12/91	5 months
Nevada	02/91	02/91	0 months
Region X--Seattle			
Alaska	06/91	09/92	15 months
Idaho	04/91	01/92	9 months
Oregon	07/91	07/92	12 months
Washington	06/91	06/92	12 months
Total 1990 - 1991 Reviews: 51 Average Time to Release Report: 7 + months Longest Period of Delay: 19 + months¹			
¹ As of February 2, 1993 these reports were not released. The elapsed time is calculated through January 1993.			

APPENDIX B

STATES SUBMISSION OF REPORTS AND REVISIONS QUARTERLY PARTICIPATION RATE STATISTICAL REPORTS (FSA-103) FISCAL YEARS 1991 - 1992 BY QUARTER							
States' Original Submission ¹				States' That Submitted Revisions ²			
Period	Timely	1 - 3 Months Late	Over 3 Months Late	Timely ³	1-3 Months Late	Over 3 Months Late	Over 9 Months Late
1st Quarter FY 1991	25	11	15	0	4	11	6
2nd Quarter FY 1991	37	8	6	1	1	5	1
3rd Quarter FY 1991	30	9	12	1	2	4	0
4th Quarter FY 1991	34	10	7	0	1	2	0
1st Quarter FY 1992	32	9	10 ⁴	0	1	4	0
2nd Quarter FY 1992	37	5	9 ⁵	0	0	2	0
3rd Quarter FY 1992	37	1	13 ⁶	1	0	0	0

¹ States include the District of Columbia

² Not all States submitted revisions to their reports. The figures in these columns reflect those States that submitted revised data.

³ We define a timely revision as being received by ACF Headquarters within one month of the date that the original report was due.

⁴ Three of these States have not submitted data for this period.

⁵ Five of these States have not submitted data for this period.

⁶ Thirteen States have not submitted data for this period.

APPENDIX C

DELAYED ACTION TRANSMITTALS			
Action Transmittal Number	Issue Date	Effective Date	Subject
AT-89-41	09/08/89	10/13/88	JOBS Systems Information
AT-90-1	01/31/90	10/01/89	Data Reporting-Implementation of Quarterly Information Collection of JOBS Program Participation (Form FSA-104)
AT-90-2	02/06/90	10/01/89	Data Reporting-Implementation of Annual Report of Target Group Expenditures Under the JOBS Program (Form FSA-302)
AT-90-8	05/11/90	10/01/89	Data Reporting-Implementation of Statistical Report on Recipients Under Public Assistance Programs (Form FSA-3637) and Data Reporting-Implementation of Monthly Flash Report of Selected Program Data (Form FSA-3645)
AT-90-11	09/07/90	10/01/89	Data Reporting-Implementation of Quarterly Participation Rate Statistical Report (Form FSA-103)
AT-90-14	10/10/90	07/01/89	JOBS Training Program Systems Information
AT-91-22	12/06/91	10/01/91	Data Reporting-Coding of Missing Data on the JOBS Program Participation Data Collection Form (Form FSA-108)
AT-91-23	12/26/91	10/01/91	Data Reporting-Implementation of Quarterly Report of Title IV-F Expenditures, Uniform Reporting Requirements (Form ACF-332)
AT-92-1	01/14/92	01/01/92	Data Reporting-Implementation of Uniform Data Collection and Reporting Requirements for Tribal Grantees, Tribal Jobs Program Quarterly Report (Form ACF-114)
AT-92-3	02/28/92	02/28/92	Pre-printed Guide for the JOBS State Plans: FY 1992 Biennial Update
CC-AT-92-1	04/06/92	10/01/91	Data Reporting-Implementation of Child Care Reporting Requirements (Form ACF-115)

APPENDIX D

ADMINISTRATION FOR CHILDREN AND FAMILIES COMMENTS

June 28, 1993

TO: Bryan B. Mitchell
Principal Deputy Inspector General

FROM: Laurence J. Love
Acting Assistant Secretary for
Children and Families

SUBJECT: Response to OIG Draft Report: "JOBS Monitoring and
Technical Assistance: Headquarters' Role,"
OEI-07-92-00380

Thank you for the opportunity to comment on this draft report. We believe the report is an improvement over the working version in providing a more balanced description of the Administration for Children and Families' (ACF) monitoring and technical assistance efforts to States for the Job Opportunities and Basic Skills Training (JOBS) program.

However, we still have a major concern with the OIG's methodology of separately reviewing Central Office (CO) and Regional Office (RO) administration of JOBS. As the report itself acknowledges, the OIG does not have a complete picture of ACF activities since it has not completed phase two of the study. Yet many of the recommendations--particularly those relative to monitoring--if adopted would significantly affect RO operations. We believe that the OIG would be in a better position to determine if such recommendations (and/or others) are necessary once it completes phase two of the study.

Our response is organized by the sections of the OIG report.

MONITORING

As stated above, we believe that the section on monitoring--specifically on the subject of the field review process--is the most troublesome for two reasons which we elaborate on below. First, the report does not give sufficient recognition to ACF policy on the respective roles of CO and RO's in conducting program reviews. Second, it seems to assume that if CO did not issue a written directive on how to carry out a review, RO's may not have conducted reviews in a professional manner.

The specific approach to monitoring JOBS and the respective roles of CO and the RO's were established by the Assistant Secretary as follows:

- all States would be reviewed during FY 1990 and FY 1991;
- field reviews would be a broad look at management, client flow, financial operations, systems, and child care;
- field reviews at this early point in implementation would be geared to gaining information and identifying potential problems;
- ACF would be explicit with States that the reviews were not compliance reviews; and
- Regional Offices would have lead responsibility for conducting the reviews, but that CO would review draft reports narrowly for "accuracy and sensitivity" given the high profile of the JOBS program.

Lead responsibility for conducting reviews means that the RO establishes the schedule for the review, makes all arrangements, writes the report, issues it (after CO review for accuracy and sensitivity), receives comments, and follows up as appropriate.

As a result it is highly likely that the OIG will find a range of procedures in the Regional Offices when it conducts that part of the review. Such variations may reflect the experiences of the Regional Administrator, the resources available to the Region, or the nature of the review that was conducted. That is different from the implication in the draft report that ACF's lack of a national policy and written procedures means that no opportunity for comment is provided or that Regions do not follow-up on the results of field reviews. We believe that such findings and recommendations should only be made after the IG conducts its review of RO operations.

We do agree with the OIG that there were delays in issuing some of the FY 1991 reports. We believe much of the delay was attributable to the comprehensive nature of the reviews that were conducted and that narrower reviews conducted in subsequent years addressed the problem of timeliness. Nevertheless, this is an area that we will look at more carefully.

TECHNICAL ASSISTANCE

In general, the report suggests that the Technical Assistance (TA) contract was the only vehicle by which ACF provided TA to State JOBS programs. The JOBS TA contract has been the primary vehicle by which CO has provided TA directly to States, but not the only one. For example, shortly after the publication of the final regulations, the Office of Family Assistance held a major

conference for over 700 Federal, State and Tribal officials to provide operation and policy guidance for the JOBS program. However, the RO's also have major responsibility for providing ongoing TA to States. They have conducted meetings with their respective States and provided operational guidance to States on a regular basis.

The report states on page nine that in less than one month the scope of work of the contract changed. This is misleading. The November 1990 memo to the Regional Administrators indicated that HHS was working with the Departments of Labor and Education to establish priority areas under Tasks 1 and 2 (assistance to program managers, assistance to providers). Once the priority areas were identified and announced in the December memo to the Regional Administrators, we no longer used the terms Tasks 1 and 2. We focussed our assistance under the priority areas and targeted first year efforts to program managers.

The report indicates on page 10 that only one priority area was addressed in FY 1991 through the conduct of six regional workshops on program design. This is inaccurate. The regional program design workshops (attended by 49 States and 4 jurisdictions) also emphasized interagency coordination strategies including State discussion forums on coordination. In addition, the contractor assisted the Department of Education in designing and facilitating various sessions at a national conference for all 50 States to promote coordination among adult and vocational education, JOBS and JTPA programs. In addition, the contractor completed Task 3--prepared and distributed a General Systems Design and Data Element Dictionary to States and conducted various on-site State visits.

In addition to the FY 1992 and FY 1993 deliverables listed in the report, the contractor also developed an agency cultural/structural change training curriculum for IV-A/IV-D/IV-F workers, provided on-site assistance to four States, and developed and distributed to 43 States and jurisdictions copies (in final draft) of Volumes I and II of a coordination handbook "Meeting the Challenges: Coordination to Promote Self-Sufficiency."

The report is correct in saying that the contractor did not address all of the subjects requested by States. We believe that it is entirely appropriate for ACF (in conjunction with its partners--the Departments of Education and Labor) to consider requests for technical assistance and determine the best way to meet those needs. That might be the contract or it might be internal technical assistance. We believe that as to the subjects identified by the States--child care, teen parents, systems, and data--such decisions were made.

For example, ACF determined that technical assistance relative to data collection for JOBS could best be delivered by ACF staff who had developed the reporting requirements. Therefore, CO staff responsible for JOBS data collection made presentations at the national JOBS conference and numerous regional conferences and has provided individual assistance to Regional Offices and States on an on-going basis.

In the area of systems, the contractor did develop a General Systems Design and Data Element Dictionary under Task 3.

As to teen parents, it is inaccurate to say that the contractor did not provide assistance. A session specifically devoted to teen parent programs was included at all the first year's RO program design workshops. In addition, ACF has continued to address teen parent issues through the field review process, specific policy guidance and identification of promising practice models.

As to child care, we purposely elected to have child care addressed by ACF staff rather than the contractor. This was due to the fact that two new major child care programs were passed by Congress in November 1990--At Risk Child Care and the Child Care Development Block Grant--and we believed that policy issues relative to child care were the predominant concern of States and that ACF staff were in a better position to address those concerns. ACF published final regulations for these programs in August 1992 and held a child care conference in December 1992.

On the distribution of products developed for workshops, we believe that there has been broad distribution of products although we acknowledge that some of the products should have been released more timely. All States and territories (except 1) attended the program design workshops in FY 1991 and received many products that the contractor had developed; forty-three States/territories attended regional workshops beginning in May 1992 where they received the final draft of Volumes I and II of the Coordination Handbook. The final version of the Coordination Handbook was then distributed to all 54 States/territories in November 1992. The General Systems Design and Data Element Dictionary was distributed to all States in August 1991.

PROGRAM GUIDANCE

The ACF acknowledges that some action transmittals and information memoranda were not issued prior to their effective date or were issued without much lead time. However, we believe that in most instances the timing was a result of the short lead time for implementation of the JOBS program which the OIG acknowledges in its Executive Summary.

For example, the provisions governing enhanced FFP were effective October 1, 1989 (prior to publication of the final rules) so ACF had to collect information back to that date even though it would have been impossible to issue data collection reporting forms prior to the publication of the final rules. Thus although the forms were at OMB before October 13, 1989, they were not actually approved and issued until early in the second quarter of FY 1990--less than four months after the final rules were published. It should be noted that while the forms were late for the States that elected to start early, for the rest of the States the reporting forms were issued prior to their implementation of the JOBS program.

As to the eleven specific Action Transmittals (AT) and Information Memoranda (IM) cited by the OIG, we believe that it is misleading to characterize some of them as "delayed instructions." AT's 89-41 and 90-14 do not contain instructions. They provide information about systems development and provide guidance on FFP rates for systems. The effective dates reflect the earliest date for which a State could claim FFP for systems development, but do not impose any requirement on States to retroactively report data. In the case of AT-92-3 on the FY 1992 Biennial update, while the effective date was also the date it was issued (2/28/92), States were not required to submit their plans until July 1, 1992.

ACF RESPONSE TO SPECIFIC RECOMMENDATIONS

OIG Recommendation

ACF should develop adequate processes to monitor States for compliance with their State Plans and JOBS program requirements.

ACF Response

Each year ACF determines its strategy for conducting JOBS reviews considering the priorities of the Assistant Secretary and the resources available to Central Office and the Regional Offices. As ACF prepares its FY 1994 strategy, we will carefully consider the OIG's recommendation.

OIG Recommendation

ACF should review and clarify the purpose of existing monitoring initiatives and strengthen the policies and procedures guiding their administration.

ACF Response

We agree with the importance to provide guides early enough to plan reviews in quarters 2, 3 and 4. We provided the FY 1993 guide to the regions on February 2, 1993 for that reason.

As to the specific recommendations about issuing written directives to RO's on how to conduct field reviews, we believe that it would be prudent to wait for the findings of the second phase of this review to determine whether such guidance is required.

OIG Recommendation

ACF should work closely with regional offices and the States to ensure the accurate, timely, and complete submission of data.

ACF Response

ACF cannot find anything in the findings section of the OIG report to suggest that it has not worked closely with RO's and States to improve data collection. We believe that the OIG will find when it conducts phase two of this investigation that CO has worked very closely with RO's and States. We will continue to do so.

We note that one of our efforts to work closely with the States to ensure better data--extending the deadline for submission of the FSA-108 from 45 days to 60 days--is criticized by the OIG in this report. Discussions with States had indicated that 45 days was not enough time to submit the required data. Therefore, we believed that it was a reasonable accommodation to give the States an additional 15 days to submit even if this was inconsistent with the Federal regulations.

OIG Recommendation

ACF should establish deadlines for the correction and finalization of States' data.

ACF Response

ACF agrees that JOBS data collection has been in place long enough now to establish such deadlines. We will consult with RO's and States on establishing reasonable deadlines and will give States sufficient notice of the deadlines.

OIG Recommendation

ACF should systematically reassess the specific needs of the States for technical assistance and provide a timely and appropriate response.

ACF Response

ACF will continue to assess the specific needs of States for technical assistance and provide as timely response as feasible. ACF will use various vehicles to identify State needs including field reviews, State surveys by contractor and RO's, TA request sheets at conferences and specific State requests either to ACF or the contractor. As a result of our ongoing efforts, we have a number of initiatives underway and planned for FY 1993 (in and outside of the TA contract) including a National JOBS Directors Conference, various on-site individual State visits, special topic informational packets and workshops and a databank directory of promising JOBS and child care State/local practices.

OIG Recommendation

ACF should ensure that action transmittals and information memoranda conform with Federal law and regulations and Agency policies.

ACF Response

ACF agrees. We believe that our decision to give States an additional 15 days beyond what is specified in the regulations to submit data was a reasonable response to the problems States were having meeting the 45-day deadline.

OIG Recommendation

ACF should allow 60 to 90 days lead time, whenever possible, for the effective dates of action transmittals and information memoranda.

ACF Response

ACF agrees. Whenever possible, we will allow 60 to 90 days lead time for the effective dates of action transmittals and information memoranda.

OIG Recommendation

ACF should develop a systematic analysis plan for JOBS program information available from field reviews, State plans, and data collection systems.

ACF Response

ACF agrees. We believe that JOBS has reached a level of maturity where such analysis will be useful.

OIG Recommendation

ACF should disseminate program information and data analysis through timely reports on varied program elements to Federal and State managers and policy makers.

ACF Response

ACF has provided large amounts of information to a wide audience. However, we agree that management information has not been disseminated in a systematic manner. With the maturity of the JOBS program, we agree that it is now appropriate to do so and we are developing some reports that would accomplish that goal.

Technical Comments

Page ii: The second sentence in the third paragraph under MONITORING minimizes the dimensions of the early reviews. It also incorrectly makes staff rather than management responsible for defining the ACF strategy (the same point applies to the second paragraph from the bottom of page 6). We offer this as a replacement paragraph:

"ACF believed it was premature to conduct compliance reviews during the early stages of implementation when it was more important to conduct comprehensive reviews to provide for a baseline understanding of how the programs were operating. Reviews in FYs 1990 and 1991 examined supportive services, child care, data collection and systems as well as JOBS."

Page 4: In the first paragraph under Field Reviews, we suggest that the second sentence be revised in this way:

In FYs 1990 and 1991, reviews were comprehensive in nature, covering child care, supportive services, systems, and data collection as well as JOBS.

Page 5: The fourth sentence in the first paragraph hypothesizes that RO's may have been reluctant to use the draft guide and in the next sentence says that regions "deferred" their field reviews until issuance of the final guide. However, it is not clear how the OIG knows this since it has not interviewed RO's yet. Indeed in the letter issuing the guidance to RO's on March 30, 1992, the Director of the Office of Family Assistance specifically tells RO's to use the guide and asks for a schedule of planned reviews. We suggest that the fourth and fifth sentences be deleted.

Page 9 - Mr. Bryan B. Mitchell

Page 6: The next to last paragraph minimizes the importance and the level of detail of the FY 1991/1992 reviews by saying that they were "...to simply get a feel for what was happening..." We recommend referring to the breadth and depth of the reviews. Further, while the reviews were not designed specifically for compliance purposes, instructions were that whenever compliance issues were identified, they were to be addressed.