



Report to the Chairman, Committee on
Education and the Workforce, House of
Representatives

May 2014

EDUCATION GRANTS

Promise
Neighborhoods
Promotes
Collaboration but
Needs National
Evaluation Plan

GAO Highlights

Highlights of [GAO-14-432](#), a report to the Chairman, Committee on Education and the Workforce, House of Representatives

Why GAO Did This Study

Education's Promise Neighborhoods program is a competitive grant program with goals to improve educational and developmental outcomes for children in distressed neighborhoods. The grants fund community-based organizations' efforts to work with local partners to develop and evaluate a cradle-to-career continuum of services in a designated geographic footprint. As it is one of several federal programs using this model GAO was asked to review the program.

This report examines: (1) the extent to which Education's strategy for awarding grants aligns with program goals; (2) how Education aligns Promise Neighborhoods efforts with other related programs; (3) how Education evaluates grantees' efforts; and (4) the extent to which grants have enabled collaboration at the local level, and the results of such collaboration.

GAO reviewed *Federal Register* notices, applications, and guidance; surveyed all 48 grantees on the application process, coordination of resources, collaboration, and early results; visited 11 grantees selected based on geography and grant type; and interviewed Education officials and technical assistance providers.

What GAO Recommends

GAO recommends that Education communicate grant expectations more clearly, identify federal resources that can contribute to the program's goals, and develop a strategy for evaluation. In commenting on a draft of this report, Education outlined the steps it will take to respond to recommendations.

View [GAO-14-432](#). For more information, contact Jacqueline M. Nowicki at 617-788-0580 or nowickij@gao.gov.

May 2014

EDUCATION GRANTS

Promise Neighborhoods Promotes Collaboration but Needs National Evaluation Plan

What GAO Found

The Department of Education (Education) used a two-phase strategy for awarding Promise Neighborhoods (Promise) grants, and aligned grant activities with program goals. Education awarded 1-year planning grants to organizations with the potential to effectively align services for students in their respective neighborhoods. Planning grants were generally intended to enhance the grantees' capacity to plan a continuum of services. Through a separate competition, Education awarded 5-year implementation grants to organizations that demonstrated they were most ready to implement their plans. However, Education did not communicate clearly to grantees about its expectations for the planning grants and the likelihood of receiving implementation grants. As a result, some grantees experienced challenges sustaining momentum in the absence or delay of implementation grant funding.

The Promise program coordinates with related federal efforts primarily through a White House initiative that brings together neighborhood grant programs at five federal agencies. The Promise program's efforts are focused on ensuring that grants are mutually reinforcing by aligning goals, developing common performance measures, and sharing technical assistance resources. While Promise grantees incorporate a wide range of federal programs in their local strategies, Education coordinates with a more limited number of federal programs. Officials told us that they do this to avoid spreading program resources too thin. Further, Education did not develop an inventory of the federal programs that share Promise goals, a practice that could assist grantees; help officials make decisions about interagency coordination; and identify potential fragmentation, overlap, and duplication.

Education requires Promise grantees to develop information systems and collect extensive data, but it has not developed plans to evaluate the program. Specifically, implementation grantees must collect data on individuals they serve, services they provide, and related outcomes and report annually on multiple indicators. However, Education stated it must conduct a systematic examination of the reliability and validity of the data to determine whether it will be able to use the data for an evaluation. Absent an evaluation, Education cannot determine the viability and effectiveness of the Promise program's approach.

The Promise grant enabled grantees and their partners to collaborate in ways that align with leading practices GAO previously identified for enhancing collaboration among interagency groups including establishing common outcomes, leveraging resources, and tracking performance. For example, Education required grantees to work with partners to develop common goals and a plan to use existing and new resources to meet identified needs in target areas. Grantees were also required to leverage resources by committing funding from multiple sources. Implementation grantees were required to collect and use data to track performance. Some planning grantees used a leading collaborative strategy not required by Education that produced early benefits. For example, several grantees and partners told us they completed easily achievable projects during the planning year to help build momentum and trust. Grantees told us that collaboration yielded benefits, including deeper relationships with partners, such as schools, as well as the ability to attract additional funding. However, grantees also said they faced some challenges collaborating with partners, particularly in overcoming privacy concerns related to data collection.

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Abbreviations

Education	Department of Education
HHS	Department of Health and Human Services
HUD	Department of Housing and Urban Development
Justice	Department of Justice
NRI	White House Neighborhood Revitalization Initiative
Promise	Promise Neighborhoods
Treasury	Department of the Treasury

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May 5, 2014

The Honorable John Kline
Chairman
Committee on Education and the Workforce
House of Representatives

Dear Mr. Chairman:

The Department of Education's (Education) Promise Neighborhoods (Promise) program aims to improve educational and developmental outcomes for students in some of the country's most distressed urban, rural, and tribal neighborhoods by aligning a suite of cradle-to-career services in a designated geographic footprint. Since 2010, Education has competitively awarded Promise planning and implementation grants to 48 community-based organizations, including nonprofits, institutions of higher education, and Indian tribes that work in partnership with several other organizations, such as schools and social service agencies. Promise Neighborhoods grants are one of several place-based strategies under the White House Neighborhood Revitalization Initiative (NRI), which was also launched in 2010. Place-based strategies focus on a specific geographic location and provide flexibility to address the area's unique needs.

The purpose of the grants is to plan for, create, and evaluate a continuum of services for children and youth residing in a target neighborhood. The Promise program provides both planning and implementation grants. In fiscal years 2010 through 2012, Education awarded a total of 46 1-year planning grants of up to \$500,000. In fiscal years 2011 and 2012, Education awarded a total of 12 5-year implementation grants of up to \$6 million per year. Almost all implementation grantees had received planning grants. No new grants were awarded in fiscal year 2013, and none have been awarded in fiscal year 2014, although Education has continued to fund prior-year implementation grants.

The Promise Neighborhood program was established in fiscal year 2010, with \$10 million from Education's discretionary Fund for the Improvement

of Education.¹ Since 2011, the program has received an appropriation in the annual appropriations acts, in amounts ranging from approximately \$30 million to \$60 million. For fiscal year 2015, the President has requested \$100 million for the program and an additional \$200 million under the President's Opportunity, Growth, and Security Initiative.²

In light of the President's requests for increased appropriations and specific statutory authority for the Promise Neighborhoods program and the increasing use of place-based strategies, you asked us to examine the Promise Neighborhoods program. To do this, we examined (1) the extent to which Education's strategy for awarding grants aligns with program goals, if at all; (2) how Education aligns Promise Neighborhoods efforts with other related programs; (3) how Education evaluates grantees' efforts; and (4) the extent to which Promise Neighborhoods grants have enabled collaboration at the local level, if at all, and the results of such collaboration.

Scope and Methodology

To determine the extent to which the structure of the Promise Neighborhoods program aligns with program goals and how Education selected grantees, we reviewed relevant *Federal Register* notices, application guidance, and agency information on applicants for fiscal year 2011 and 2012 implementation grants.³ To determine how Education aligns Promise grant activities with other federal programs, we reviewed documentation on Education's alignment efforts. To assess Education's approach to evaluating the program, we reviewed its grant monitoring reports, performance measures, and guidance for data collection. To determine the extent to which Promise grants enabled collaboration at the local level, we used GAO's prior work on enhancing collaboration in

¹The conference report accompanying H.R. 3288 included \$10 million for Promise Neighborhoods. H.R. Rep. No. 111-366, at 1051 (2009) (Conf. Rep.).

²Office of Management and Budget, *Budget of the United States Government, Fiscal Year 2015* (Washington, D.C.: March 2014).

³Fiscal years 2011 and 2012 were the only years in which Education awarded implementation grants.

interagency groups as criteria.⁴ We compared the Promise grants' collaboration approaches to certain successful approaches used by select interagency groups and reviewed implementation grantees' application materials. To learn about grantees' experiences with the program, we conducted a web-based survey of all planning and implementation grantees nationwide from late August to early November 2013. We received responses from all 48 grantees. We asked grantees to provide information on the application and peer review process, coordination of federal resources, collaboration with local organizations, and results of the planning grants. Because not all respondents answered every question, the number of grantees responding to any particular question will be noted throughout the report. In addition, we conducted site visits to 11 planning and implementation grantees. During these visits, we interviewed five planning grantees and six implementation grantees. Sites were selected based on several factors, such as the type of grant awarded, the location of grantees, and whether they were urban or rural. For all four objectives, we interviewed Education officials, technical assistance providers, and subject matter specialists from the Promise Neighborhoods Institute.⁵ (See appendix I for more detail on the scope and methodology.)

We conducted this performance audit from February 2013 to May 2014 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

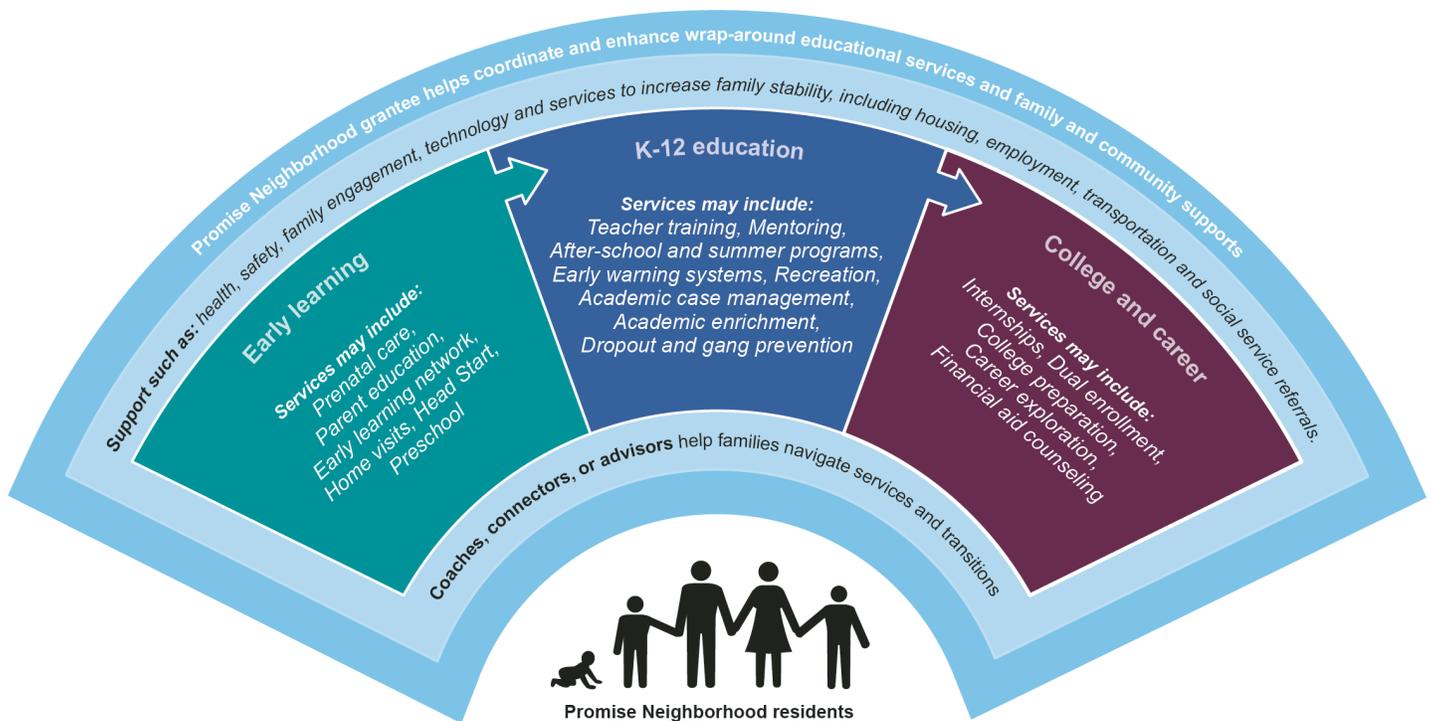
⁴GAO, *Managing for Results: Implementation Approaches Used to Enhance Collaboration in Interagency Groups*, [GAO-14-220](#) (Washington, D.C.: Feb. 14, 2014). To identify the approaches we selected four interagency groups that use key practices for enhancing and sustaining collaboration. To identify successful approaches, we reviewed agency documents and interviewed agency officials who participated in these groups.

⁵The Promise Neighborhoods Institute is a nonprofit independent organization affiliated with PolicyLink. The institute supports Promise Neighborhoods grantees and aspiring Promise Neighborhoods by providing technical assistance with its partners, the Harlem Children's Zone and the Center for the Study of Social Policy. The Center for the Study of Social Policy is one of Education's contracted technical assistance providers.

Background

The Promise Neighborhoods program is a place-based program that attempts to address the problems of children and youth in a designated geographic footprint. The program is designed to identify and address the needs of children in low-performing schools in areas of concentrated poverty by aligning a cradle-to-career continuum of services. The program moves beyond a focus on low-performing schools by recognizing the role an entire community plays in a child's education (see fig. 1). Place-based initiatives provide communities the flexibility to address their unique needs and interrelated problems by taking into account the unique circumstances, challenges, and resources in that particular geographic area.

Figure 1: Sample Continuum of Cradle-to-Career Services



Source: GAO analysis of applications, grantee depictions, and program documentation.

The Promise program is one of several place-based initiatives at the federal level, but it is the only one focused on educational issues. In addition to Education, the Departments of Justice (Justice), Housing and Urban Development (HUD), and Health and Human Services (HHS) also have grant programs aimed at impoverished neighborhoods. Together, these four agencies and their grant programs form the core of the White

House Neighborhood Revitalization Initiative. This initiative coordinates neighborhood grant programs at the federal level across agencies, and identifies and shares best practices. Each agency's grant program focuses on its respective agency's core mission, but together, they focus on key components of neighborhood revitalization, education, housing, crime prevention, and healthcare.

Promise Neighborhoods Model

Generally, the purpose of the Promise grants is to fund individual grantees' efforts to plan for and create a cradle-to-career pipeline of services based on the specific needs of their communities. The grants are focused on improving student outcomes on 15 performance indicators, chosen by Education. Along with the grantee, partner organizations, funded by federal, state, local, private, or nonprofit organizations, are expected to collaborate to provide matching funds and services.

A number of nonprofits and foundations have worked on initiatives to address complex problems in a similarly comprehensive way. Their approach brings together a group of stakeholders from different sectors to collaborate on a common agenda, align their efforts, and use common measures of success. This approach has been described as the collective impact model.⁶ The premise of the model is that better cross-sector alignment and collaboration creates change more effectively than isolated interventions by individual organizations. A number of organizations have used this approach to address issues such as childhood obesity and water pollution.

⁶John Kania and Mark Kramer, "Collective Impact," *Stanford Social Innovation Review*, (Winter 2011).

Several other cradle-to-career place-based collective impact programs share key characteristics with the Promise program, including Cincinnati's Strive program and the Harlem Children's Zone.^{7 8} These collective impact initiatives use a centralized infrastructure and a structured process, including training, tools, and resources, intended to result in a common agenda, shared measurement, and mutually-reinforcing activities among all participants. This centralized infrastructure requires staff to manage technology, communications support, data collection, reporting, and administrative details. The Promise grantees' role is to create and provide this centralized infrastructure for their communities.

Types of Grants

The Promise program relies on a two-phase strategy for awarding grants, which includes both one-year planning grants and three- to five-year implementation grants.⁹ (See table 1.)

Table 1: Promise Neighborhoods Planning and Implementation Grants (2010-2012)

	Planning grant	Implementation grant
Description	Supports a comprehensive needs assessment, a prioritization process to identify areas where interventions could be most successful, and design of a longitudinal data system to track results and student outcomes for children in the neighborhood.	Supports implementation of strategies developed in planning phase. Funds can go toward a wide range of coordination and outreach efforts, building and operating longitudinal data systems, and some direct services.
Length and amount	1-year grants; up to \$500,000 each	5-year grants; up to \$6 million per year
Number awarded	46	12

Source: GAO analysis of relevant *Federal Register* notices and documents from Education.

⁷Cincinnati's Strive program brings together representatives from private and corporate foundations, city governments, school districts, universities and community colleges, and education-related nonprofit and advocacy groups to coordinate improvements at every stage of a young person's life, from "cradle to career." Within 4 years Strive reported positive trends on almost two-thirds of its success indicators, including high school graduation rates and fourth grade reading and math scores.

⁸The Harlem Children's Zone provides a range of support services to address problems in a 100-block area in New York City, including poor housing, failing schools, violent crime, and chronic health problems. The program provides parenting workshops, preschool, health initiatives, charter schools, in-school programs, and after-school programs, among other services.

⁹According to Education officials, all implementation grants awarded to date have been for 5-year projects.

Among other things, planning grantees are required to conduct a comprehensive needs assessment of children and youth in the neighborhood and develop a plan to deliver a continuum of solutions with the potential to achieve results.¹⁰ This effort involves building community support for and involvement in developing the plan. Planning grantees are also expected to establish effective partnerships with organizations for purposes such as providing solutions along the continuum and obtaining resources to sustain and scale up the activities that work. Finally, planning grantees are required to plan to build, adapt, or expand a longitudinal data system to provide information and use data for learning, continuous improvement, and accountability.

The implementation grant provides funds to develop the administrative capacity to implement the planned continuum of services. Education expects implementation grantees to build and strengthen the partnerships they developed to provide and sustain services and to continue to build their longitudinal data systems.

Education awarded most of the 2010-2012 grants to non-profit organizations (38 of 48), eight to institutions of higher education, and two to tribal organizations. Almost all (10 of 12) implementation grantees received planning grants, while two did not. (See fig. 2 for locations of grantees.) (See appendix II for a list of grantees and year of grant award.)

¹⁰For both planning and implementation grants, Education considers only applications that meet the criteria for an absolute priority. Under these priorities, applicants are required to describe in detail about how they will carry out the project. Federal regulations require grantees to carry out the project as specified in their approved applications. 34 C.F.R. § 75.700. As a result, throughout this report we refer to the numerous aspects of the application required under an absolute priority as “requirements,” as the grantees are required to carry out the project as described in their applications.

Grant Requirements Enabled Education to Identify Organizations with Potential to Coordinate Student Services

The planning and implementation grant activities that Education developed for the Promise program generally align with Education's goal of significantly improving the educational and developmental outcomes of children and youth in the nation's most distressed communities. According to Education officials, the planning grant award process enabled them to identify community-based organizations in distressed neighborhoods with the potential to effectively coordinate the continuum of services for students living in the neighborhood. The eligibility requirements, which included matching funds or in-kind donations and an established relationship with the community to be served, helped to ensure that grantees had financial and organizational capacity and were representative of the area to be served. Education developed criteria to evaluate applications and select grantees based on the grantees' ability to describe the need for the project; the quality of the project design, including the ability to leverage existing resources; the quality of the project services; and the quality of the management plan.

Education's Promise planning grants were intended to enhance the capacity of identified organizations to create the cradle-to-career continuum. The activities required of planning grantees enable grantees and their partners to gain a depth of knowledge about their communities and the communities' needs, which can increase their capacity to focus on improving educational and developmental outcomes for children and youth throughout their neighborhood.

Through a separate competition, Education identified organizations that application reviewers determined were most ready to implement their plans. While acknowledging that the implementation grantees are best positioned to determine the allocation of grant funds, Education expects that grant funds will be used to develop the administrative capacity to implement the planned continuum and that the majority of resources to provide services to students and families will come from other public and private funding sources rather than from the grant itself. This expectation gives the Promise strategies a chance to extend beyond the 5-year life of the grant. Further, the requirement that grantees build a longitudinal data set allows Promise grantees and their partners to review and analyze robust data in real time to make informed decisions about whether to adjust their strategies. The data can also help the grantees and Education learn about the impact of the program.

Education identified 10 desired results from implementation of the program, which cover the cradle-to-career age span that Promise Neighborhoods are expected to address. A technical assistance provider

stated that the list of desired results help grantees focus on improving educational and developmental outcomes across the entire continuum. (See table 2.) (The indicators that measure progress toward achieving results are listed in Appendix III.)

Table 2: Desired Results of the Promise Neighborhoods Grants

Focus	Result
Academic	Children enter kindergarten ready to succeed in school
	Students are proficient in core academic subjects
	Students successfully transition from middle school grades to high school
	Youth graduate from high school
	High school graduates obtain a postsecondary degree, certification, or credential
Family and community supports	Students are healthy
	Students feel safe at school and in their community
	Students live in stable communities
	Families and community members support learning in Promise Neighborhood schools
	Students have access to 21st century learning tools

Source: Relevant *Federal Register* notices.

Education’s Two-Phase Grant Strategy Created Challenges for Some Grantees

Education’s grantee selection process was generally clear and transparent. However, Education did not communicate clearly to planning grantees about the probability of receiving an implementation grant and its expectations for grantees to continue their efforts without implementation funding. This lack of clarity created challenges for some grantees.

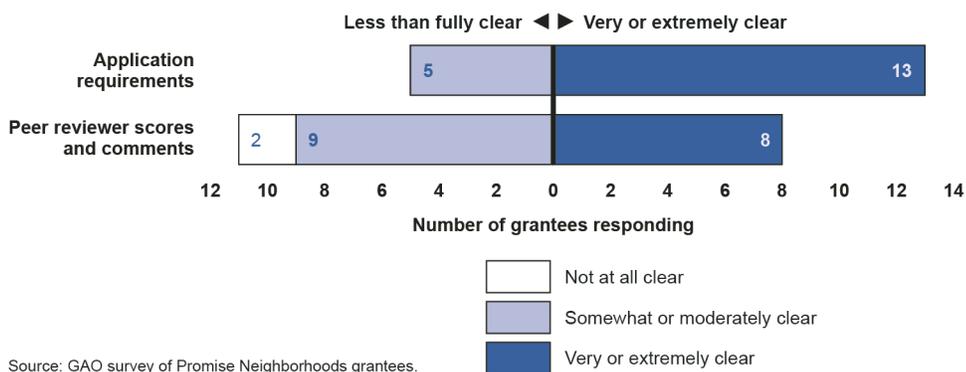
Education’s Selection Process

Education outlined its selection criteria and how grant applications would be scored in its grant announcements and selected peer reviewers from outside the organization. According to Education officials, the peer reviewers had expertise in various related fields, including community development and all levels of education. Education provided additional training on the application review process. For the planning grant selection, Education divided about 100 peer reviewers into panels of three to review packages of about 10 applications. Afterward, peer reviewers conferred about scores in a conference call.

For the first implementation grant selection, Education had a two-tiered peer review process. During the first tier, peer reviewers were divided into panels of three to review approximately seven applications. During the second tier review of the 16 highest scoring applications, panels of reviewers were adjusted so that different reviewers read and scored different applications. For the second implementation grant selection, there was only one round of reviews. Reviewers were asked to review the applications and submit comments before meeting on-site to discuss applications. Education posted the results online, including peer reviewer comments for grantees and a list of applicants with scores above 80 out of 100 points.

In our web-based survey of grantees, grantees had mixed views on the clarity of application requirements and the helpfulness of peer reviewer comments. Specifically, 13 of 18 planning grantees who applied unsuccessfully for implementation grants and responded to the relevant survey question said the application requirements were very clear or extremely clear, while 8 of 19 grantees that responded said the same about peer reviewer scores and comments (see fig. 3). The unsuccessful applicants gave somewhat lower marks to the helpfulness of peer reviewer comments in improving their future applications and strengthening their current strategies (see fig. 4).

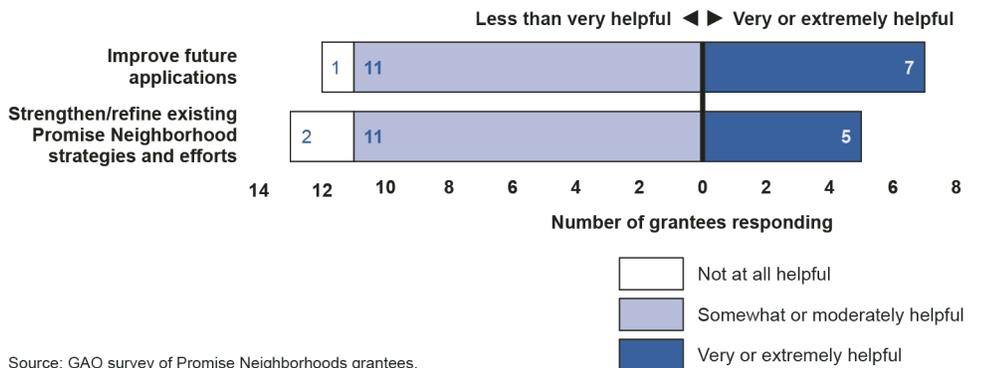
Figure 3: Applicants' Views of the Clarity of Implementation Grant Application Requirements and Peer Reviewer Scores and Comments



Source: GAO survey of Promise Neighborhoods grantees.

Note: Not all grantees responded to all questions.

Figure 4: Applicants' Views of Helpfulness of Peer Reviewer Comments



Source: GAO survey of Promise Neighborhoods grantees.

Note: Not all grantees responded to all questions.

Some of the 11 planning and implementation grantees that we interviewed raised concerns about specific application guidelines, such as how the term “neighborhood” is defined and the length of the application. Specifically, two rural grantees said that the grant application and materials had a few areas that seemed to be more geared to urban or suburban grantees. For example, the term “neighborhood” was somewhat difficult for them to interpret in a rural context. In fact, two rural grantees included multiple towns or counties in their neighborhood footprints. Additionally, two grantees we spoke with had concerns about the implementation grant application’s 50-page recommended maximum for the project narrative. Both organizations limited their narratives to 50 pages, but said they later learned that most of the successful grant recipients had exceeded this limit, often by a large amount.

The timing of the grant cycles created either an overlap or a long gap between the two grants. Grantees who applied for the implementation grant in the first cycle after receiving a planning grant had an overlap between executing the first grant and applying for the second grant. According to Education officials these grantees were unable to fully apply the knowledge gained in the planning year to develop their implementation applications. For example, one grantee said having to apply for the implementation grant during the planning year made it difficult to create opportunities for community input into the planning process. On the other hand, one of the four grantees that received an implementation grant 2 years after receiving a planning grant faced challenges sustaining the momentum of its efforts without additional funding. Another grantee in the same situation was able to sustain momentum with a separate grant from a private foundation. Education

officials said they became aware of the problems with the timing of the implementation applications a few months into the first planning grant year. However, they said they did not have much flexibility in timing the grant cycles. For example, they said that they needed to allow time for public comment on the grant notification in the *Federal Register*. In addition, they said that agency budget decisions were delayed that year because the Department was operating under a continuing resolution for over 6 months in fiscal year 2011—the first year implementation grants were awarded.

Some grantees also said there was a disconnect between the planning and the implementation grant application processes. Specifically, two officials from the six implementation grantees we visited told us that a high-quality planning year was not nearly as important for obtaining an implementation grant as having someone who could write a high-quality federal grant application. For example, one grantee noted that writing a good implementation grant application was not heavily dependent on information gleaned from the planning process. Another grantee said that the implementation grant application was written by a completely different person who was not involved in planning grant activities.

Challenges with the Two-Phase Strategy

Some grantees who received only planning grants reported in our survey and in interviews that they experienced challenges continuing their work without implementation funds. In addition, two of the five planning grantees we interviewed had concerns with Education's strategy of awarding few implementation grants compared with the number of planning grants.¹¹

Education informed grantees there was a possibility they would not receive an implementation grant following the planning grant, but no information was provided about the likelihood of whether this would occur. We found indications that grantees did not fully appreciate that receiving a planning grant would not necessarily result in receiving an implementation grant. Three of the five planning grantees we interviewed stated that they did not have contingency plans for continuing their Promise Neighborhood efforts in the event that they did not receive

¹¹Because we asked grantees to generally discuss what suggestions they had for improving the program, not all of the grantees we interviewed commented specifically about Education's two-phase strategy for awarding grants.

implementation funding.¹² The lack of contingency planning raises questions about the grantees' understanding of the probability of receiving an implementation grant. Internal control standards state that management should ensure that effective external communications occur with groups that can have a serious impact on programs, projects, operations, and other activities, including budgeting and financing.¹³ To date, Education has awarded 46 planning grants (21, 15, and 10 in 2010, 2011, and 2012, respectively) and 12 implementation grants. Even though all but two implementation grants were awarded to planning grantees, fewer than one-quarter of planning grantees received implementation funding.¹⁴ (See table 3.)

Table 3: Successful Implementation Grant Applications from Planning Grantees

Year planning grant received	2010	2011
Number of recipients	21	15
Number that applied for 2011 implementation grants	19	n/a
Number awarded 2011 implementation grants	4	n/a
Number that applied for 2012 implementation grants	10	8
Number awarded a 2012 implementation grants	4	2

Source: GAO analysis of applicant lists from Education.

Note: In both 2011 and 2012, there was also one successful implementation grant applicant that had not previously received a planning grant.

Education officials provided several reasons for separating the planning and implementation grants and for not awarding implementation grants to all planning grantees who applied. Officials said that when they awarded the first planning grants, they were not sure which neighborhoods had potential grantees with the capacity to implement a Promise plan. In their view, the planning grants allowed them to invest in the capacity of

¹²One of the five planning grantees we interviewed had not yet applied for an implementation grant.

¹³GAO, *Internal Control: Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999).

¹⁴Of the 21 grantees who received planning grants in 2010, 8 received implementation grants in either 2011 or 2012. Of the 15 2011 planning grantees, two have received implementation grants. Two implementation grants were awarded to grantees who had not received planning grants. Education did not award any additional planning or implementation grants for 2013 or 2014.

communities to take on this work, while the implementation grants were only awarded to those that demonstrated they were ready for implementation. Education officials said it was important that grantees demonstrate they have an implementation plan in place before receiving such a large sum of money. In addition, after the first round of implementation grants were awarded, they noted that some applicants did not receive implementation grants because they were not yet competitive—in part because they had applied for the implementation grants before their planning efforts were complete. Finally, in commenting on a draft of this report, Education officials said that in several years, Congress appropriated less funds than were requested, which, they said, affected the number of implementation grants Education awarded.

In 2010, both Education's *Federal Register* Notice Inviting Applications for planning grants and a related frequently asked questions document informed organizations receiving planning grants that they should not necessarily plan on automatically receiving implementation grants.¹⁵ The frequently asked questions guidance noted that the two types of grants could stand alone. For example, an applicant could receive just a planning grant, consecutive planning and implementation grants, or—if the applicant was further along in the planning process—just an implementation grant. Education officials told us that they viewed the planning grant activities as useful in themselves. For example, they told us that the planning process offers rich data and begins the process of bringing together partners and breaking down silos. They expected that planning grantees that applied for but did not receive implementation funding could continue their efforts without implementation grant funding, using their partners' pledged matching funds to implement their plans on a smaller scale. They noted that the requirement to develop memoranda of understanding with partners should have signaled that the obligations of the partner organizations were not to be contingent upon receipt of an implementation grant. However, Education did not require grantees to have matching funds in-hand before submitting their applications. Especially in light of the difficult fiscal climate that federal agencies will

¹⁵The 2010 *Federal Register* Notice Inviting Applications for planning grants noted that in subsequent years, contingent on the availability of funds, the Department intended to conduct competitions for implementation grants, as well as competitions for new Promise Neighborhoods planning grants. The 2010 *Frequently Asked Questions* issued by Education also stated that planning grantees would not automatically receive implementation grants and would compete for implementation grants alongside applicants who did not compete for or receive a planning grant.

likely continue to face in the future, we believe that it is important for Education to clearly communicate to grantees regarding expectations for planning and implementation grants. Clear communication and expectations can also help promote more realistic expectations among grantees about future funding opportunities given the fiscal realities of the Promise program over the past 5 years.

Grantees who had not received implementation grants were trying to continue their efforts and most reported significant challenges in sustaining momentum. According to our survey, since the end of the planning grant, most planning grantees who did not receive an implementation grant (17 out of 29 that answered the related question) found it very or extremely challenging to maintain funding, 12 out of 29 planning grantees felt that maintaining key leadership positions was very or extremely challenging, and 13 out of 29 planning grantees found that hiring staff was very or extremely challenging.

Four of the five planning grantees we interviewed who had not received implementation grants told us that they need to determine how to implement scaled-down versions of programs and services identified in their implementation grant applications. They described challenges continuing their work without implementation funding. For example, three grantees noted that partners had pledged funding as a match for federal dollars in their implementation grant proposal. Without the leverage of implementation grant funds, it was difficult to maintain the proposed funding streams.¹⁶ All of the five grantees we interviewed that had received only planning grants said the planning process was very helpful in building connections and trust and deepening communication among partners, and between partners and the community. Four grantees were concerned, however, that the trust and momentum they had built might dissipate if they were not able to carry out their plans without an implementation grant.

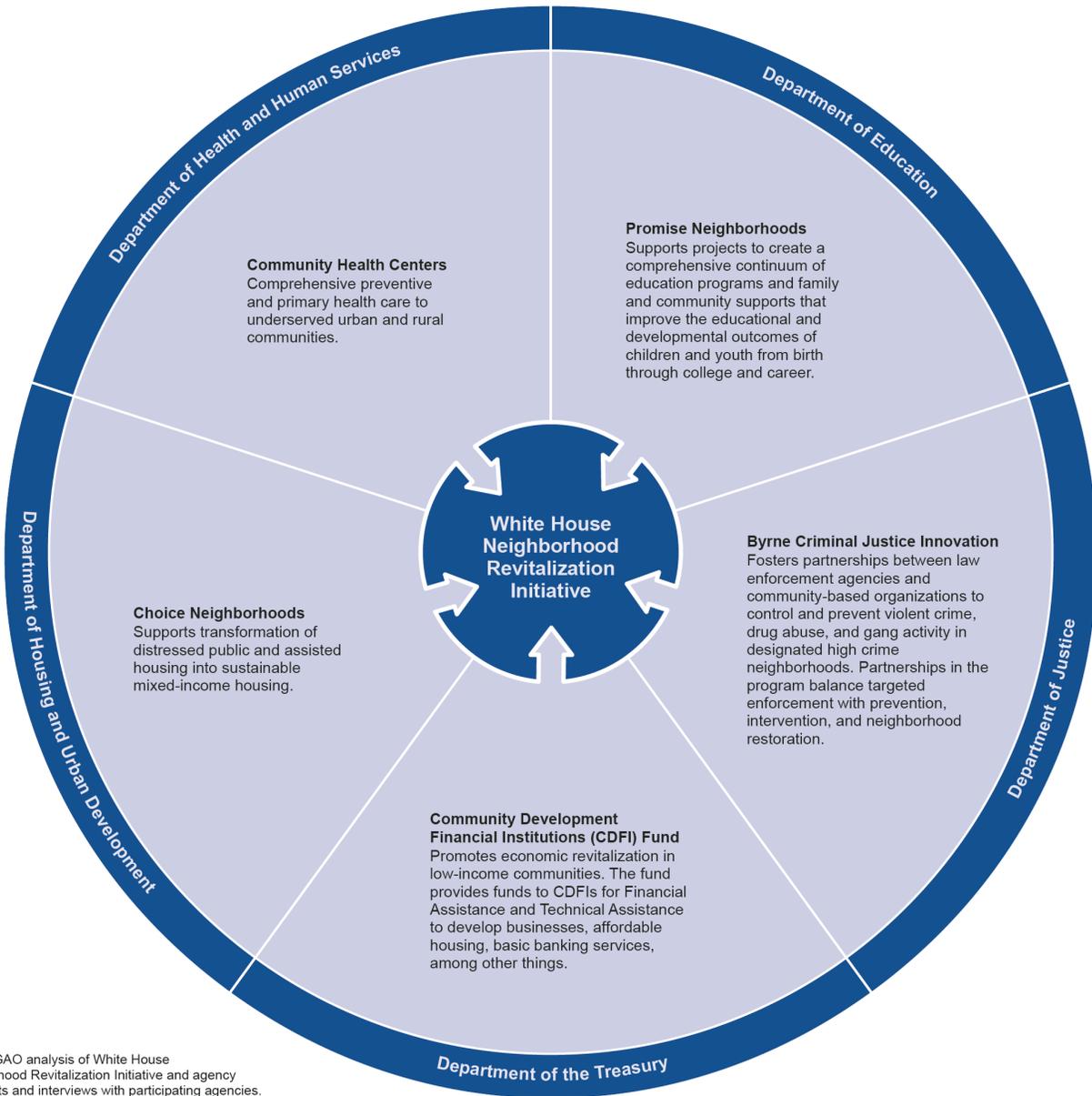
¹⁶Because we asked grantees to generally discuss how they sustained momentum in the absence of implementation funding, not all grantees provided information about whether they were able to keep pledged matching funds.

**Promise
Neighborhoods
Program Coordinates
with Some Programs
with Related Goals
but Has No Inventory
of Related Programs**

**Promise Program
Coordinates Closely with
Some Related Federal
Programs to Align Grants**

In an effort to target its resources and align the Promise program goals with those of other place-based initiatives, the Promise program coordinates closely with a limited number of federal programs within Education and with other federal programs as part of the White House Neighborhood Revitalization Initiative (NRI). The NRI is an interagency coordinating body that aligns place-based programs run by HUD, HHS, Justice, and the Department of the Treasury (Treasury) (see fig. 5). Coordination through NRI is more structured than internal coordination within Education, which, according to Promise program officials, occurs as needed. Liaisons from each grant program meet at biweekly and monthly NRI meetings. They have formed a program integration workgroup to coordinate program development, monitoring, and technical assistance for the grant programs included. For example, they conducted a joint monitoring trip to a neighborhood in San Antonio, Texas that has Promise, HUD's Choice Neighborhood, and Justice's Byrne Criminal Justice Innovation grants.

Figure 5: Key Efforts Contributing to the White House Neighborhood Revitalization Initiative



Source: GAO analysis of White House Neighborhood Revitalization Initiative and agency documents and interviews with participating agencies.

Note: HHS' Community Health Centers have been in existence since the 1960s. Treasury's Community Development Financial Institutions Fund was established in 1994 by the Riegle Community Development and Regulatory Improvement Act of 1994. HUD's Choice Neighborhood program was launched in 2010 to replace HUD's HOPE VI program. DOJ's Byrne Criminal Justice Innovation program made its first grants in 2012.

In coordinating within Education and with NRI, Education's efforts are focused on ensuring that grants are mutually reinforcing. These coordination activities include aligning goals, developing common performance measures where there are common purposes, and sharing technical assistance resources in areas where programs address similar issues or fund similar activities. (See table 4.)

Table 4: Examples of Promise Neighborhoods Program Coordination within Education and with NRI

Coordination activity	Example of coordination within the Department of Education	Example of coordination within NRI
Align grant language or activities and establish competitive preference priority. ^a	Education aligned the Promise program and the Race to the Top grant program to ensure grant activities were mutually reinforcing by including a competitive preference priority in the Race to the Top program. ^b Applicants could receive points under this priority for doing work similar to that funded by the Promise program, such as increasing the schools' core resources by providing additional student and family services. This allows districts to further some of the aims of the Promise program when carrying out Race to the Top activities, even if they did not have Promise grantees in their districts. Promise officials were also involved in the peer review process for selection of Race to the Top Early Learning Challenge grantees. ^c	Education and HUD have coordinated to establish competitive preference priorities. The Choice Neighborhoods planning grant application included a categorical preference for Promise planning grantees who meet Choice planning grant requirements. Similarly, the Promise Program includes a competitive preference priority for Choice grantees. There are some neighborhoods with both Choice and Promise grants, but, according to Education, most Promise grantees do not have distressed public housing in their geographic footprints.
Align goals and share performance measures	The Promise program coordinated with Education's Office of Safe and Healthy Students to align the student safety performance measure with one that was being used by the Safe Schools/Healthy Students program. ^d	To align goals and measures, the agencies use common language in grant applications and share performance indicators where there are mutual interests. For example, one of the indicators of need included in the Promise planning grant notice is high rates of vacant or substandard homes, including distressed public and assisted housing, which is aligned with the HUD's Choice grant program.
Share technical assistance resources	The Promise office hosted a joint webinar with School Improvement Grant recipients. ^e	The integration workgroup is exploring ways to share technical assistance with the agencies' respective grantees. For example, Education officials stated they are trying to find a way to use the technical assistance provided to Byrne grantees to help Promise grantees who have public safety concerns. In addition, Education has invited other NRI programs to annual grantee conferences to conduct workshops on integrating the grants.

Source: GAO analysis based on interviews with Education officials, NRI documentation and grant announcements.

^aUnder a competitive preference priority, preference is given to an application by (1) awarding additional points, depending on the extent to which the application meets the priority or (2) selecting an application that meets the priority over an application of comparable merit that does not meet the priority. 34 C.F.R. § 75.105(c)(2). For example, in the Race to the Top District program, an applicant received points under this priority based on the extent to which it integrated public and private resources to augment the schools' core resources by providing additional student and family supports, such as addressing the social-emotional, behavioral, and other needs of participating students giving highest priority to those in high-needs schools.

^b Education created Race to the Top under the American Recovery and Reinvestment Act of 2009 to provide incentives for states to reform K-12 education in areas such as improving the lowest performing schools and developing effective teachers and leaders.

^c Race to the Top Early Learning Challenge grants are meant to support states' efforts to increase the number and percentage of low-income and disadvantaged children enrolled in high-quality early learning programs and to design and implement an integrated system of high-quality early learning programs and services. The program is run jointly by Education and HHS.

^d The Office of Safe and Healthy Students' mission is to support the creation of safe, disciplined, drug-free and healthy learning environments for students.

^e The School Improvement Grants program funds reforms in the country's lowest-performing schools with the goal of improving student outcomes, such as standardized test scores and graduation rates.

The Promise program has also participated in another place-based program led out of the White House Domestic Policy Council: the Strong Cities, Strong Communities initiative.¹⁷ This program sends teams of federal officials to work with distressed cities, providing them expertise to more efficiently and effectively use the federal funds they already receive. Education's Promise program participates in initial on-site assessments of communities. Education staff assisted two of the participating communities by providing education expertise at their request.

As of 2013, Education also began taking part in the Promise Zone initiative, a new program intended to accelerate and expand the work taking place under NRI grant programs such as Promise Neighborhoods. Unlike the Promise Neighborhoods program, which focuses primarily on the educational and developmental needs of children and youth, the Promise Zones program addresses economic security, jobs, education, affordable housing, and public safety in high-poverty areas usually larger than a neighborhood.¹⁸ The Promise Zone initiative, launched in 2013, is lead by HUD and takes an approach that is similar to that used by Strong Cities, Strong Communities in that it brings together expertise from multiple agencies. It is a place-based initiative that does not receive direct federal funding but uses existing resources from programs within the NRI

¹⁷This city-focused, interagency program began in 2011.

¹⁸Promise Zones had to meet a number of requirements, including meeting certain poverty thresholds and having certain population levels.

agencies and five other agencies¹⁹ in partnership with state and local governments, businesses, and non-profit organizations.²⁰ Only areas that already had certain NRI grants or a similar rural or tribal grant were eligible to apply in the first round. As of January 2014, three Promise Neighborhoods implementation sites in San Antonio, Los Angeles, and Southeastern Kentucky were located in designated Promise Zones, which provide additional opportunity for coordination at the federal and local level.

The Promise Neighborhoods program does, on occasion, coordinate with other individual federal agencies and programs outside of the NRI, but officials stated that the program is focused on deepening and broadening the communication it has with the five named NRI programs and Promise Zones. Promise Neighborhoods officials explained that they had concerns about spreading their coordination efforts too thinly given the large number of programs grantees may include in their strategies.

Education Does Not Have an Inventory of Federal Programs with Similar Goals

In addition to Promise grants from Education, individual Promise Neighborhoods have access to a broad range of federal programs from other agencies, including many programs that are not part of NRI. However, Education has not developed an inventory of federal programs that could contribute to Promise program goals that it could share with planning and implementation grantees and use to make its own decisions about coordination across agencies. In recent work examining approaches used by interagency groups that successfully collaborated, we found that an inventory of resources related to reaching interagency goals can be used to promote an understanding of related

¹⁹Applicants are usually municipalities or non-profit organizations working with the municipality. Designations allow the zones to receive on-the-ground technical assistance from federal agencies to solve problems and navigate federal programs. In addition they will be eligible for competitive preference priority in applying for certain grants from the 10 federal agencies involved in the effort. Designated Promise Zones use existing resources to make new investments in the community with their local business and non-profit partners and have identified related outcomes they will track. The administration has also proposed employer tax incentives to create jobs for Zone residents and attract private capital to disinvested places. The first five of twenty Zones were designated in January 2014: San Antonio, Philadelphia, Los Angeles, Southeastern Kentucky, and the Choctaw Nation of Oklahoma.

²⁰The five other agencies are the Departments of Commerce, Labor, and Agriculture, the Small Business Administration, and the Corporation for National and Community Service.

governmentwide programs.²¹ Such inventories are useful in making decisions about coordinating related programs across agency lines and between levels of government, according to officials. We have also found that creating a comprehensive list of programs is a first step in identifying potential fragmentation, overlap, or duplication among federal programs or activities.²²

As shown in table 5, the 12 implementation grantees we surveyed stated that they included a variety of federal resources in their Promise Neighborhoods strategies. AmeriCorps was included in 9 out of 11 implementation grantees' strategies,²³ followed by Head Start (8 of 12) and Education's School Improvement Grants (6 of 11). None of these are part of NRI. Few grantees said that NRI programs were part of their Promise strategies. For example, four grantees said that a Choice Neighborhood grant was part of their Promise strategy, and three grantees stated that DOJ's Byrne program was part of their strategy. Education officials attributed the small number of grantees that use HUD's Choice program to the fact that few grantees have distressed public housing within their footprint that is eligible for this funding.

²¹GAO, *Managing for Results: Implementation Approaches Used to Enhance Collaboration in Interagency Groups*, [GAO-14-220](#) (Washington, D.C.: February 14, 2014). The GPRA Modernization Act of 2010 requires the Director of the Office of Management and Budget to compile and make publicly available a comprehensive list of all federal programs identified by federal agencies. Pub. L. No. 111-352, § 7, 124 Stat. 3866, 3876.

²²GAO, *2013 Annual Report Actions Needed to Reduce Fragmentation, Overlap, and Duplication and Achieve Other Financial Benefits*, [GAO-13-279SP](#) (Washington, D.C.: Apr. 9, 2013). This report and previous GAO annual reports on this topic have highlighted the challenges associated with the lack of a comprehensive list of federal programs and funding information.

²³Not all respondents answered every question.

Table 5: Federal Resources Leveraged by Promise Neighborhoods Implementation Grantees

Agency	Federal grants/programs (NRI programs are shaded)	Number of grantees who said program was included in a Promise Neighborhood strategy
HUD	Choice Neighborhood grants	4
	Other HUD grants	4
DOJ	Byrne grants	3
	Other DOJ grants	2
HHS	Community Health Center	4
	Head Start	8
	Early Head Start	5
	Other HHS Grants	3
Education	Race to the Top	3
	School Improvement Grants	6
	Investing in Innovation	3
	21st Century Learning	4
	Full Service Community Schools	2
	Federal TRIO Programs	5
	GEAR UP	5
	Early Reading First	1
	Other Education grants	0
	Corporation for National and Community Service	AmeriCorps
Social Innovation Fund		1
DOL	YouthBuild	3
USDA	Nutrition Programs	3

Source: GAO analysis of survey of Promise Neighborhood grantees.

Although Promise grantees conduct their own inventories of the existing federal and other resources in their neighborhoods in order to develop their strategies, two grantees we spoke with were unaware of some of the other federal programs that could contribute towards their strategies. For example, one implementation grantee we spoke to with concerns about school safety was unaware of DOJ’s Byrne Criminal Justice Innovation grant program. Another planning grantee who completed our survey commented that a list of related federal programs like the one in our survey would be especially useful to grantees who did not receive implementation grants. Education officials with the Promise program told us that sometimes grantees are unaware that the community is benefiting

from certain federal programs because programs are renamed as they filter down through the state or local levels. Education officials said they emphasize to grantees the importance of reaching out to key partners to ensure they are aware of other federally funded programs in the neighborhood because their partners may be more knowledgeable about other sources of federal funding. While encouraging grantees to reach out to key partners is helpful, Education, through its coordination with other federal agencies, would likely have more knowledge about existing federal resources.

Without a federal level inventory, Education is not well-positioned to support grantee efforts to identify other federal programs that could contribute to Promise program goals. Further, Education lacks complete information to inform decisions about future federal coordination efforts and identify potential fragmentation, overlap, and duplication.

Education Collects Extensive Data but Has Not Determined Whether or How to Evaluate the Program

While Education is collecting a large amount of data from Promise grantees that was intended, in part, to be used to evaluate the program, the Education offices responsible for program evaluation—the Institute for Educational Sciences (IES) and Office of Planning, Evaluation, and Policy Development (OPEPD)—have not yet determined whether or how they will evaluate the program.

One of Education’s primary goals for the Promise program, as described in the *Federal Register*, is to learn about the overall impact of the program through a rigorous program evaluation. Applicants are required to describe their commitment to work with a national evaluator for Promise Neighborhoods to ensure that data collection and program design are consistent with plans to conduct a rigorous national evaluation of the program and the specific solutions and strategies pursued by individual grantees. We have found that federal program evaluation studies provide external accountability for the use of public resources. Evaluation can help to determine the “value added” of the expenditure of federal resources or to learn how to improve performance—or both. Evaluation can play a key role in strategic planning and in program management, informing both program design and execution.²⁴

²⁴GAO, *Designing Evaluations: 2012 Revision*, [GAO-12-208G](#) (Washington, D.C.: January 2012).

Education requires implementation grantees to report annually on their performance using 15 indicators. The indicators include graduation rates, attendance, academic proficiency, student mobility, physical activity, and perceptions of safety. (See table 11 in appendix III.) Education contracted with the Urban Institute to provide guidance on how to collect data on the indicators, including data sources and survey techniques. According to Urban Institute officials, they used existing, validated measures whenever possible to ensure comparability across programs.²⁵ Seven of twelve implementation grantees we surveyed said the guidance documents were extremely or very helpful, while four found it moderately helpful and one somewhat helpful.

The Urban Institute has analyzed the data on the indicators for the first implementation year (the baseline), but Education has not decided whether it will make the first year's data public because it was not collected in a consistent manner and not all grantees were able to collect all of the necessary data. According to Promise program officials there were inconsistencies in data collection because guidance was not available until February 2013, 13 months after 2011 implementation grants were awarded and over 1 month after 2012 implementation grants were awarded.

Promise officials stated that they will use the performance data to target their technical assistance. They are still working with grantees to develop meaningful targets for the second implementation year. Urban Institute officials noted that these 15 indicators help grantees focus their efforts on the outcomes they are trying to achieve.

In addition, Promise grantees are required to develop a longitudinal data system to collect information on the individuals served, services provided in the cradle-to-career continuum, and the related outcomes.²⁶ Grantees are expected to use the longitudinal data to evaluate their programs on an

²⁵Urban Institute, *Measuring Performance: A Guidance Document for Promise Neighborhoods on Collecting Data and Reporting Results*, prepared for the U.S. Department of Education (Washington, D.C.: February 2013).

²⁶The Promise Neighborhoods Institute works closely with the technical assistance provider and provides assistance to high-scoring Promise Neighborhoods applicants and both implementation and planning grantees. It has made longitudinal database software available to all grantees free of charge.

ongoing basis and make adjustments to their strategies and services, as discussed later in this report.

Grantees are also required to provide the longitudinal data to Education, which Education officials said they may use to create a restricted-use data set. However, Education currently does not have a plan for analyzing the data. In commenting on a draft of this report, Education stated it must first conduct a systematic examination of the reliability and validity of the data to determine whether it can be used for a descriptive study and a restricted-use data set. Education further stated that the restricted-use data set would only be made available to external researchers after Education determines that the data quality is adequate and appropriate for research; analyzes the data, taking into account privacy concerns; and determines whether to release its own report. In addition, officials from IES and OPEPD cited limitations and challenges to using the longitudinal data for program evaluation.

- An official from IES, the entity responsible for all impact evaluations conducted by Education, told us that it is not feasible to conduct an impact evaluation of individual program pieces or an overall evaluation of the Promise approach. The official offered three options for evaluation. IES' preferred option is to conduct a rigorous impact evaluation with a control group obtained through randomized assignment to the program. However, Promise Neighborhoods are not designed to create such a control group. Another option would be for IES to use students or families who were not chosen to participate in an oversubscribed program as a control group, but an informal poll that IES took at a Promise Neighborhoods conference suggested that there were not a sufficient number of oversubscribed programs. A third option was to develop a comparison group of neighborhoods that did not receive a Promise Neighborhood grant. However, IES officials question whether such an approach would enable them to match neighborhoods that were comparable to Promise neighborhoods at the beginning of the grant period. Finally, IES noted that collecting additional data for a control group could be expensive.
- Education's OPEPD is responsible for conducting other types of program evaluations. According to Education officials, it could conduct a more limited evaluation focused on outcomes without demonstrating that they are a direct result of the Promise program, but they have no specific plans to do so. An OPEPD official stated OPEPD is reluctant to commit to a plan because they have not yet seen the data and do not know how reliable or complete it will be. In addition, the official said that OPEPD is unsure about funding and that any comprehensive

evaluations are expensive to carry out. By creating a restricted-use data set, OPEPD hopes that other researchers may have the funding to use the data to reach some conclusions about the program. The OPEPD official further explained that no one has ever evaluated a community-based approach like this one and that they hope researchers may have some ideas about how to do so.

Researchers at the Urban Institute and within the Promise grantee community have proposed other options for evaluating the program. A researcher at the Urban Institute²⁷ noted that random assignment is not the right approach for evaluating place-based programs.²⁸ Instead, the researcher recommends a variety of other options for evaluating such programs, including approaches that estimate a single site's effect on outcomes and aggregating those outcomes. This differs from the traditional program evaluation approach, which IES has considered, of isolating the effects of an intervention so that its effects can be measured separately from other interventions.

While Education recognizes the importance of evaluating the Promise program, they lack a plan to do so. If an evaluation is not conducted, Education will have limited information about the Promise program's success or the viability of the program's collaborative approach.

²⁷The researcher proposed this option in his capacity as an independent researcher, not as part of the Urban Institute's contract for technical assistance.

²⁸Nichols, Austin, *Evaluation of Community-Wide Interventions*, (Washington, D.C.: July 2013). Random assignment is an evaluation design in which participants are either randomly selected to receive a service or assigned to a control group. According to Nichols, the traditional program evaluation approach does not lend itself to evaluation of the Promise program because the Promise program aims to produce change by affecting the entire community, not just those who receive direct services. In addition, place-based programs are not the same from one place to another. These programs offer different interventions based on the communities' and the individuals' unique needs, and interventions may change as outcome data is analyzed.

Grantees Collaborate Using Leading Practices, Resulting in Benefits and Challenges

Promise Grant Framework Encourages Collaboration

The Promise program generally requires grantees to use collaborative approaches. We found that grantees are following approaches consistent with those we have recognized as enhancing and sustaining collaboration with partners.²⁹ The approaches we have previously identified include:

- *Establishing common outcomes:* Establishing common outcomes helps collaborating agencies develop a clear and compelling rationale to work together.
- *Addressing needs by leveraging resources:* Leveraging the various human, information technology, physical and financial resources available from agencies in a collaborative group allows the group to obtain benefits that would not be available if they worked separately.
- *Tracking performance and maintaining accountability:* Tracking performance and other mechanisms for maintaining accountability are consistent with our prior work, which has shown that performance information can be used to improve results by setting priorities and allocating resources to take corrective actions to solve program problems.

The approaches are discussed below and in Tables 6 through 8.

²⁹GAO, *Managing for Results: Implementation Approaches Used to Enhance Collaboration in Interagency Groups*, [GAO-14-220](#) (Washington, D.C.: Feb. 14, 2014).

Establishing Common Outcomes

Table 6: Approaches for Establishing Common Outcomes

Select collaboration approaches identified by GAO	Grantee collaboration activities required by Education	Examples of grantee and partner collaboration
<ul style="list-style-type: none"> Start group with the most directly affected participants and gradually broaden to others. Conduct outreach to stakeholders to identify shared interests. Identify early wins for the group to accomplish. Develop outcomes that represent the collective interests of participants. 	<ul style="list-style-type: none"> Establish, build and strengthen partnerships for purposes such as providing services and obtaining resources. Document partnerships with memoranda of understanding which explain how partner organizations' desired results align with the Promise program. Develop a plan to deliver the continuum of services during the implementation years and describe how the grantee has built community support for and involvement in the development of the plan. Propose clear and measurable annual goals as well as short and long term goals, as appropriate, for the implementation grant. 	<ul style="list-style-type: none"> 44 of 46 grantees that received planning grants reported that they brought service providers together to break down silos. One grantee partnered with several organizations on a key goal for their Promise Neighborhood—building an early childhood foundation and early learning network. Three of the grantees' partners identified their own long term goals that align with the early childhood foundation in the memoranda of understanding.

Source: [GAO-14-220](#) and GAO analysis of relevant *Federal Register* notices.

A significant majority of the grantees we interviewed stated that working with partners to establish common outcomes and strategies helped foster closer relationships between stakeholders in the community. One grantee stated that in some cases, organizations were doing work in the neighborhood in isolation from each other. The Promise grant helped bring these organizations together. Similarly, another grantee stated that Promise is distinct from other federal programs in that it provides funds for organizations to create partnerships and facilitate collaboration.

Almost all grantees stated that working collaboratively to meet the requirements of the grant helped break down barriers with local schools. Specifically, our survey results indicated that for 44 out of 46 grantees that received planning grants, the grants enabled or enhanced their existing efforts to build relationships with schools. Three of the 11 grantees we interviewed also stated that one of the benefits of working collaboratively was building relationships between school administrators. For example, one Promise grantee stated that bringing partners together to establish common goals and strategies enabled the grantee to introduce the local elementary school principal to the principal of the secondary school where students typically transition for the next phase of

their education. Another grantee reports being able to strengthen relationships among local school leaders. For example, the grantee stated that the schools are developing plans to use the same student identification code for the duration of each student's attendance in the schools.

Four grantees and partners we interviewed stated that one of the lessons learned from their planning year was that undertaking practical, achievable collaborative projects that can be completed in the short term helped build momentum in their Promise efforts. Grantees stated that the grant does not designate funds for Promise sites to identify and achieve early tangible benefits for the community, and it is unclear whether grantees we did not interview also set aside funds for this purpose. However, the several grantees that raised outside funds during the planning grant year for projects such as building playgrounds and other safe, outdoor community spaces stated that these early accomplishments helped build trust and goodwill with the community. Our recent work on collaboration found that identifying such "early wins" can enable collaborative groups to practice working together and allows participants to build upon recent experiences, working relationships, improved knowledge of related programs, and team structures to coordinate group activities.³⁰ Given that many grantees do not receive implementation funding, some planning grantees may be missing an opportunity to demonstrate early in their Promise efforts what can be achieved when they work collaboratively. Such demonstrations can encourage grantees and their partners to continue their efforts even without implementation funding.

³⁰[GAO-14-220](#).

Addressing Needs by Leveraging Resources

Table 7: Approaches for Identifying and Addressing Needs by Leveraging Resources

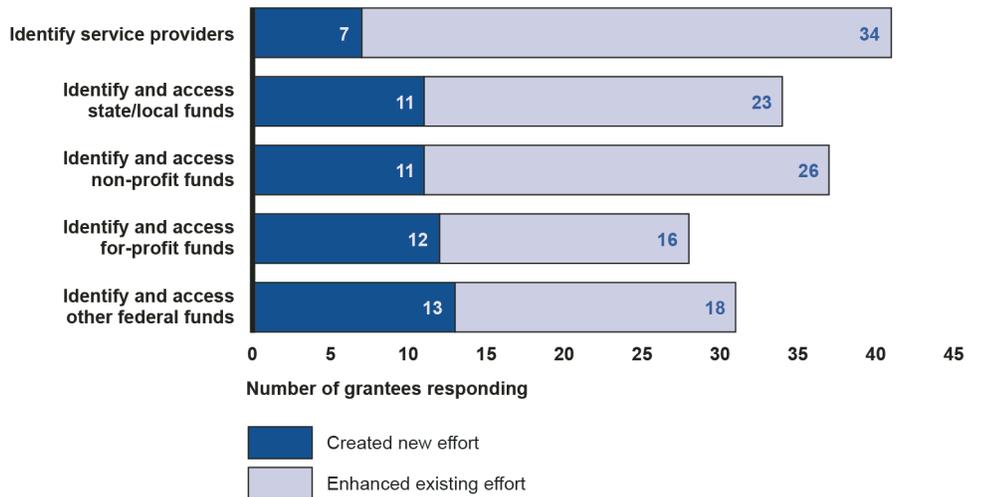
Select collaboration approaches identified by GAO	Grantee collaboration activities required by Education	Examples of grantee and partner collaboration
<ul style="list-style-type: none"> • Create an inventory of resources dedicated towards interagency outcomes. • Leverage related agency resources towards the group's outcomes. • Pilot test new collaborative ideas, programs or policies before investing resources. 	<ul style="list-style-type: none"> • Complete a needs assessment and prioritization analysis during the planning year to identify and serve children with the highest needs.^a • Planning and implementation grantees must obtain funds or in-kind donations to match a percentage of the Promise program funding they will use to support their project. • Establish clear, annual goals for evaluating progress in leveraging resources for the implementation grant. 	<ul style="list-style-type: none"> • Several grantees stated that studying the needs of the community and mapping neighborhood assets during the planning year helped them more appropriately target resources. For example, during the planning year one grantee found that the community lacked afterschool programming options and residents lacked knowledge of existing services. The grantee partnered with two local schools to create a resource hub which now offers academic support, referrals, family literacy, and parent engagement opportunities.

Source: GAO-14-220 and GAO analysis of relevant *Federal Register* notices.

^aEducation refers to the prioritization analysis as a segmentation analysis.

Implementation grantees reported that the grant enhanced their ability to access resources. Specifically, our survey results indicated that the grants enabled 41 out of 46 grantees that received planning grants to build new efforts or enhance existing efforts for identifying service providers. A majority of grantees also reported that the grant enabled new efforts or enhanced existing efforts to secure funding from non-profits or federal, state and local government (see fig. 6).

Figure 6: Resources Leveraged by Promise Neighborhoods Grantees



Source: GAO survey of Promise Neighborhoods grantees.

Several grantees we interviewed stated that identifying and leveraging resources to address needs helped them identify gaps in services and identify resources that were not being adequately used. Additionally, implementation grantees we surveyed reported that they were able to decrease overlapping services. Specifically, 7 of 12 implementation grantees reported reduced overlap of activities and resources as a result of collaborating with their Promise partners. Grantees reduced overlap by subcontracting services from partner organizations rather than providing similar services in-house, consolidating outreach to community members for specific programs, proactively identifying children who are likely to attend a variety of programs to ensure that resources are optimized, and reducing case management services for families being served by multiple agencies.

Four of the six implementation grantees and partners we interviewed found that the Promise implementation grant helped or may help them attract funding. For example, officials from one Promise Neighborhood stated their efforts increased funders' confidence in their capacity to implement other initiatives. As a result, the grantee received a \$500,000 donation from a funder to pilot a family economic mobility initiative.

Tracking Performance and Maintaining Accountability

Table 8: Approaches for Tracking Performance and Maintaining Accountability

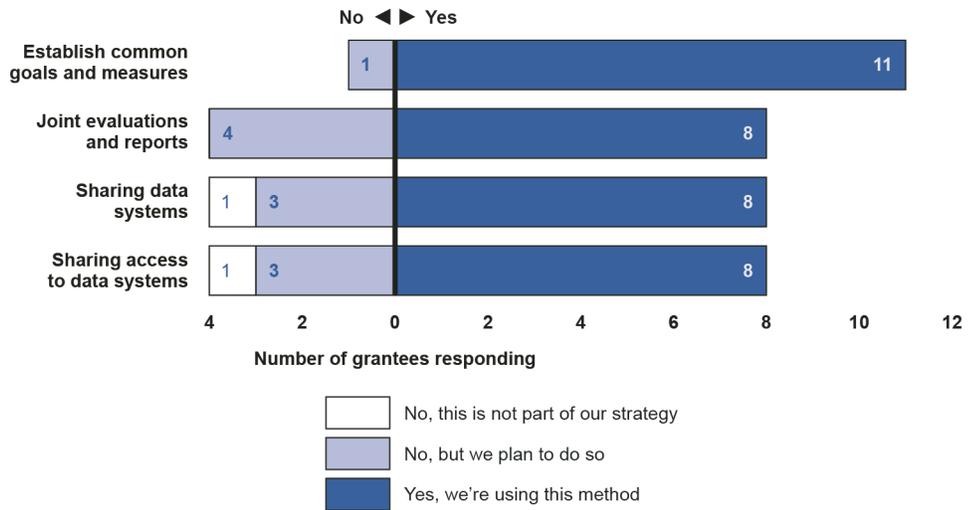
Select collaboration approaches identified by GAO	Grantee collaboration activities required by Education	Examples of grantee and partner collaboration
<ul style="list-style-type: none"> Develop performance measures and tie measures to shared outcomes. Identify and share relevant agency performance data. Develop methods to report on progress. 	<ul style="list-style-type: none"> Link specific activities and solutions to measures that can be used to track progress. Develop data systems that integrate data from multiple sources. Use data to manage program performance and to report progress. 	<ul style="list-style-type: none"> All six of the implementation grantees we interviewed stated that they are either in the process of building or deploying longitudinal data systems or generally collecting and tracking data. Additionally, 8 of 12 implementation grantees surveyed reported that they currently share access to their data systems with their partners.

Source: GAO-14-220 and GAO analysis of relevant *Federal Register* notices.

Four of the 11 grantees we interviewed mentioned that they have mechanisms in place to ensure that partners are committed to achieving their expected outcomes, such as score cards.³¹ Further, a majority of the implementation grantees we surveyed reported that they currently work or plan to work with their partners to share access to data systems and establish performance measures, among other things (see fig. 7).

³¹Because we asked grantees to generally discuss how they were using data, not all of the grantees we interviewed specifically discussed the mechanisms they have in place to ensure that their partners are achieving expected outcomes.

Figure 7: Number of Implementation Grantees Who Reported They Collaborate With Their Partners to Track Performance and Maintain Accountability



Source: GAO survey of Promise Neighborhoods grantees.

A majority of the grantees we surveyed stated that they had conducted or were planning to conduct an evaluation of their efforts at the local level. Fourteen of 44 respondents said they had conducted a formal evaluation, while 17 said they were planning to do so. Eighteen said they had conducted a formal process evaluation, and another 18 said they planned to do so.³²

All of the implementation grantees we interviewed stated that they are still in the process of developing their data collection and monitoring efforts and several are addressing significant challenges during this process. Additionally, 16 of 39 grantees reported in our survey that since the end of the planning grant, they have found it very or extremely challenging to develop their data collection infrastructure. Specifically:

- Two of the six implementation grantees we interviewed stated that because the Urban Institute’s guidance for collecting data and reporting results was not released until after they received

³²A process evaluation examines whether a program is operating as intended rather than whether it achieved the outcomes it is intended to achieve.

implementation funds,³³ they began their implementation efforts with inadequate knowledge of the work required and resources they would need to meet the data requirements for the program. For example, officials from one Promise Neighborhood stated that Promise funding for evaluation is limited and that planning how to spend funds for evaluation may be difficult without an idea of how resource intensive it may be to meet the program's data requirements. According to these officials, Education's technical assistance providers stated that it should take two staff members (one full-time and one half-time) to build and maintain the data system. However, officials from the neighborhood only dedicated one staff member to manage their data system. Further, officials from two Promise Neighborhoods stated that some of the Promise Neighborhood's partners who are supposed to submit data to the longitudinal database do not have the capacity or technical ability to use the longitudinal database software provided by the Promise Neighborhoods Institute. Officials stated that they have to provide help to their partners in order for them to navigate the database.

- Grantees in collaboration with their partners are expected to enroll children and families in a data system and collect, store and use identified individual-level data and other personally identifiable information in order to monitor Promise efforts. However, federal laws and regulations restrict how grantees may access and share this data in order to protect the privacy of individual-level data. Students' school records are covered by the Family Educational Rights and Privacy Act of 1974 (FERPA)³⁴ and medical records are covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA).³⁵ Promise grantees must obtain written consent in order to access and

³³The Urban Institute released its guidance for grantees on collecting and reporting data in February 2013.

³⁴FERPA protects the privacy of student education records. 20 U.S.C. § 1232g. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education. Under FERPA, schools generally must have written consent from the parents or eligible student in order to release information from a student's education record.

³⁵HIPAA and its implementing regulations provide federal protections for individually identifiable health information and give patients an array of rights with respect to that information. Pub. L. No. 104-191, 110 Stat. 1936 (1996); 45 C.F.R. Parts 160, 164. These provisions generally require that health insurers and providers must have consumers' permission before their health information can be used or shared for certain purposes, such as marketing.

share individual-level data from schools for students in their target areas, in certain circumstances. Six of the 11 grantees we spoke with stated that one challenge they faced was getting consent to access and share students' records. For example, officials from one Promise Neighborhood stated they sent separate consent forms for sharing private data as part of the package of paperwork that parents are normally required to sign before the start of the school year. However, officials noted concern over whether they will be able to get signed consent forms from all families in the target area. Further, officials stated that they are concerned that the students and families that need Promise programs and services the most may not be signing consent forms and granting access to their information. Similarly, officials from another Promise Neighborhood stated that they have 2,100 children targeted in their geographic footprint but only received consent forms to collect and share individual-level data on 80 percent of those children. Officials stated that they are considering using aggregate data to report outcomes for the children that they do not receive consent forms for.

Grantees Collaborate to Deliver a Range of Services

Grantees and partners provided examples of how they have collaborated through the Promise grant to deliver services and supports that are intended to improve educational and developmental outcomes. Grantees and their partners focused on delivering services at various steps along the cradle-to-career pipeline, including:

- *Early learning supports:* programs or services designed to improve outcomes and ensure that young children enter kindergarten and progress through early elementary school grades demonstrating age-appropriate functioning.
- *K-12 supports:* programs, including policies and personnel, linked to improving educational outcomes for children in pre-school through 12th grade. These include developing effective teachers and principals, facilitating the use of data on student achievement and student growth to inform decision-making, supporting a well-rounded curriculum, and creating multiple pathways for students to earn high school diplomas.
- *College and career supports:* programs preparing students for college and career success. These include partnering with higher education institutions to help instill a college-going culture in the neighborhood, providing dual-enrollment opportunities for students to gain college credit while in high school, and providing access to career and technical education programs.

- *Family and community supports:* these include child and youth physical, mental, behavioral and emotional health programs, safety programs such as those to prevent or reduce gang activity and programs that expand access to quality affordable housing.

For examples of the services delivered and outcomes reported by grantees for each part of the cradle-to-career pipeline, see table 9 below.

Table 9: Selected Promise Neighborhoods Collaborative Efforts and Outcomes

Support type	Neighborhood location	Service activity	Reported outcome
Early learning supports	Boston, MA	Established a workgroup to create and implement school readiness and quality early learning strategies for children birth to age 5.	Began forming an Early Learning Network of neighborhood center-based and home-based providers to develop an early childhood system of care.
	San Diego, CA	Grantee worked with local elementary school partner to implement a transition to kindergarten program.	Helped children develop early social-emotional skills, improved their behavior and kindergarten attendance rates, enabled faculty and parents to interact, and allowed parents to become familiar with school facilities.
K-12 supports	Los Angeles, CA	Co-located grantee staff as onsite coordinators and advisors to school administrators to identify and manage community services.	Gave the student counselor more time to focus her efforts on academics rather than on managing agencies and outside resources to support students' non-academic needs.
	Boston, MA	Partnered with a local organization that provides residency-based teacher education programs to write the charter for a Pre-K–5th grade charter school.	Opened a new charter school in the neighborhood to provide families with more school choice.
	Berea, KY	Identified a need to help at-risk students graduate from high school through partnerships with local schools.	Held an intensive summer school program for at-risk high school students, which helped four participating students graduate in August and avoid a 5th year in high school.
College and career supports	Indianola, MS	Grantee partnered with the school district led by the district conservator to develop a college preparatory program.	Modified the school day across all schools to include an extra period at least twice a week. This extended learning time is used to improve students' retention of school subject areas and provide students with ACT preparation, among other things.
	San Diego, CA	Conducted a needs assessment and confirmed the need for more support to help families and students understand and discuss opportunities for college education.	Partnered with a local college support organization to develop a college-prep program for students grades 2-5 that provides academic advising for students and parents.
Family and community supports	Boston, MA	Worked with a local school and partners to launch a homelessness prevention initiative that identifies students and families at risk of losing their homes and helps them avoid eviction.	Created a safety net for approximately 50 homeless students at its partner schools.

Support type	Neighborhood location	Service activity	Reported outcome
	Los Angeles, CA	Used funds from Department of Labor programs to develop youth source centers.	Provides residents with tools such as computer labs for computer literacy classes, youth services, and has space available for local schools to use for presentations and workshops.

Source: GAO analysis of site visits with Promise Neighborhoods grantees.

Conclusions

The Promise program has energized the 48 planning and implementation grantees and their partners to tackle the complex challenges facing impoverished neighborhoods together. While grantees said they will continue their efforts to build their Promise Neighborhoods, planning grantees faced challenges in sustaining their work over the long term without implementation grants. Planning grantees, especially those concerned about building trust with their communities and partners, may have been better served if Education had provided a more transparent, realistic picture of the fiscal reality of the Promise program and its potential impact on implementation grant funding. Lack of clear communication about the expectations Education had for planning grantees who did not receive implementation funding made it difficult for these grantees to develop specific plans to continue their efforts without future Promise funds. However, the reported small, yet tangible benefits that some communities pursued during the planning year—such as a safe place for children to play—increased momentum and built trust with community members. Encouraging such “early wins” could help all grantees and their partners build upon and improve their efforts, especially since implementation funding has proven scarce.

Additionally, much of the information grantees use about what existing federal, state, and local programs and resources to incorporate into their strategies is gleaned through their needs assessment at the local level. Education has not provided grantees with comprehensive information about other federal resources that may be available to use in their Promise strategies. Education is best positioned to develop and share such an inventory of federal programs that relate to the goals of the Promise program. Without such an inventory, Education may be missing opportunities to better support grantees, find other federal programs for future coordination efforts, and identify potential fragmentation, overlap, and duplication at the federal level.

One of the Promise program’s primary goals is to identify the overall impact of its approach and the relationship between particular strategies

and student outcomes. Grantees are investing significant time and resources to collect data to assess the program, but Education lacks a clear plan for using it. Without evaluating program, it will be difficult for Education to determine whether it is successfully addressing the complex problem of poor student outcomes in impoverished neighborhoods. Finally, the Promise program is one of several place-based and collective impact programs being implemented across many federal agencies. Given the number of these initiatives, not evaluating the program limits Education and other agencies from learning about the extent to which model is effective and should be replicated.

Recommendations for Executive Action

In order to improve grantees' planning and implementation efforts, increase the effectiveness of grantee efforts to integrate and manage resources, and learn more about the program's impact, we recommend that the Secretary of Education take the following three actions:

1. Clarify program guidance about planning and implementation grants to provide reasonable assurance that planning grantees are better prepared to continue their efforts in the absence of implementation funding. Additional guidance could include encouraging grantees to set aside a small amount of the grant to identify and deliver early, tangible benefits to their neighborhoods.
2. Develop and disseminate to grantees on an ongoing basis an inventory of federal programs and resources that can contribute to the Promise Neighborhoods program's goal to better support coordination across agency lines.
3. Develop a plan to use the data collected from grantees to conduct a national evaluation of the program.

Agency Comments

We provided a draft of this report to the Department of Education for review and comment. Education's comments are reproduced in appendix IV and are summarized below. Education also provided technical comments, which we incorporated into the final report as appropriate. Education outlined the steps it would take to implement our three recommendations, and provided its perspective on communicating expectations to grantees regarding future funding. Education did not explicitly agree or disagree with our findings.

Regarding our finding that Education did not communicate clearly to planning grantees about its expectations for the grants, Education stated that in any given year it does not know and therefore cannot

communicate the amount of funding available or the number of grant awards anticipated in the following year. We agree, and have clarified our finding in the report accordingly.

Education stated that an early assessment of planning grantees' likelihood of receiving implementation funding would have been premature. Education noted that although Congress has funded the Promise program for the past 5 years, in 4 of those 5 years it appropriated far less than the President requested, and for the last 3 years the program has essentially been level funded. Education further stated that this underscores the limited control that the program had over the number of implementation grants made. We recognize that federal agencies have faced a difficult fiscal climate over the past few years, particularly for discretionary programs. For that reason—and especially given the level at which the Promise program has been funded for the past 3 years—we believe it is even more important that Education be clear and transparent with planning grantees about historical fiscal realities of the Promise program and the implications this may have on future implementation grants. We also believe this situation highlights the need for planning grantees to have contingency plans, especially given Education's expectations that grantees continue their efforts even in the absence of implementation funding. We further believe that this also underscores the importance of "early wins" to demonstrate what can be achieved when grantees and their partners work collaboratively, as such demonstrations can encourage them to continue their efforts even without implementation funding.

In discussing its perspective on communicating expectations to grantees regarding future funding, Education stated that its Notifications Inviting Applications indicated that future funding was contingent on the availability of funds and that the program's frequently asked questions document noted that implementation funding was not guaranteed and that planning grantees would have to compete for implementation grants. We believe that our report adequately reflects these communication efforts. However, as we reported, Education did not communicate to planning grantees that it expected them to continue their efforts even in the absence of implementation funding. Nor did Education communicate to implementation grant applicants that it expected them to be able to use their partners' pledged matching funds even if they did not receive implementation grants. This lack of communication was evidenced by planning grantees' lack of contingency plans and challenges they faced accessing the pledged matching funds, according to the grantees we interviewed.

In response to our first recommendation, Education stated that it would continue to communicate to planning grant applicants that implementation funding is contingent on the availability of funds, and that it would provide more targeted technical assistance to planning grant recipients regarding strategies for continuing grantees' efforts absent implementation funding. Education also stated that it would clarify to grantees that planning grant funds could be used to achieve early, tangible benefits.

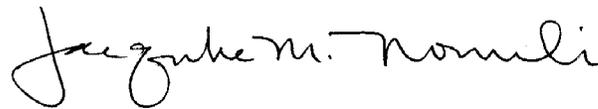
Regarding our second recommendation, Education stated that it would work with its technical assistance providers to create a mechanism to distribute a comprehensive list of external funding opportunities, programs and resources on a regular basis to better support the grantees' implementation efforts.

With regard to our final recommendation, Education stated that it will consider options for how and whether it can use the data collected from grantees to conduct a national evaluation. Education stated that as a first step it will conduct a systematic evaluation of the reliability and validity of the data, given issues that we and Education noted about inconsistencies in data collection and privacy concerns. In addition, Education stated that to date, it has not received sufficient funding to support a national evaluation. We agree that conducting evaluations can be costly. However, given that one of Education's primary goals is to learn about the overall impact of the program through a rigorous program evaluation, we continue to believe that absent an evaluation, it will be difficult for Education to determine whether it is successfully addressing the complex problem of poor student outcomes in impoverished neighborhoods—one of its stated goals. Further, developing an evaluation plan would provide critical information about the resources required to conduct an evaluation, and could better inform future funding requests for such an evaluation.

As agreed with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies of this report to the Secretary of Education and other interested congressional committees. In addition, the report will be available at no charge on GAO's website at <http://www.gao.gov>.

If you or your staff have any questions regarding this report, please contact me at 617-788-0580 or NowickiJ@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are in appendix V.

Sincerely yours,

A handwritten signature in black ink that reads "Jacqueline M. Nowicki". The signature is written in a cursive style with a large initial 'J' and a long horizontal stroke at the end.

Jacqueline M. Nowicki
Acting Director, Education, Workforce, and Income Security

Appendix I: Objectives, Scope, and Methodology

To better understand grantees' experiences with the Promise Neighborhoods program, we conducted a web-based survey of all 48 planning and implementation grantees. The survey was conducted from August 23, 2013 through November 7, 2013. We received completed surveys from all 48 grantees for a 100 percent response rate. The survey included questions about the clarity and helpfulness of the application and peer review process, challenges sustaining efforts after the end of the planning grant, coordination of federal resources, collaboration with local organizations and associated challenges, the extent to which local coordination reduced duplication, overlap and fragmentation, if at all, the mechanisms organizations use to track the results of their efforts, the results of the grants, and the helpfulness of Education's guidance and resources for the program.

Because this was not a sample survey, there are no sampling errors. However, the practical difficulties of conducting any survey may introduce nonsampling errors, such as variations in how respondents interpret questions and their willingness to offer accurate responses. We took steps to minimize nonsampling errors, including pretesting draft instruments and using a web-based administration system. Specifically, during survey development, we pretested draft instruments with five grantees that received planning and/or implementation grants. In the pretests, we were generally interested in the clarity, precision, and objectivity of the questions, as well as the flow and layout of the survey. For example, we wanted to ensure definitions used in the surveys were clear and known to the respondents, categories provided in closed-ended questions were complete and exclusive, and the ordering of survey sections and the questions within each section was appropriate. We revised the final survey based on pretest results. We took another step to minimize nonsampling errors by using a web-based survey. This allowed respondents to enter their responses directly into an electronic instrument and created a record for each respondent in a data file—eliminating the need for manual data entry and its associated errors. To further minimize errors, programs used to analyze the survey data were independently verified to ensure the accuracy of this work. Because not all respondents answered every question, we reported the number of grantees responding to particular questions throughout the report.

In addition, we conducted site visits to 11 Promise grantees. We selected sites based on several factors, such as the type of grant awarded, the location of the grantees, and whether the Promise Neighborhood was urban or rural. The site visits provided opportunities to collect more in-depth information on the program and highlighted different types of

grantees and approaches. We visited six implementation grantees in Boston, Massachusetts; Berea, Kentucky; Chula Vista, California; Indianola, Mississippi; Los Angeles, California; and Washington, DC. We visited five planning grantees in Campo, California; Lawrence, Massachusetts; Los Angeles, California; Nashville, Tennessee; and Worcester, Massachusetts. These include one tribal and two rural grantees. We also interviewed Education officials and technical assistance providers, as well as other experts who have worked with Promise grant applicants, such as the Promise Neighborhoods Institute.

To determine how well the structure of Education's Promise Neighborhoods grant program aligns with program goals and how Education selected grantees, using Education's goals for the Promise program as criteria, we reviewed Education reports on place-based strategies; relevant *Federal Register* notices; and application guidance and training materials, including both the guidance available to applicants and to the peer reviewers regarding the technical evaluation/grant selection process. We reviewed agency information on applicants for implementation grants in the fiscal year 2011 and 2012 cycles, as fiscal years 2011 and 2012 were the only years in which Education awarded implementation grants. For both cycles, we analyzed application materials and technical evaluation documentation for a subset of implementation grant applicants—those that received planning grants in prior years. We compared the scores in each component of the application for both successful and unsuccessful applicants to identify criteria or factors that accounted for significant variation in total scores. We conducted a limited review of selected peer reviewer comments to gain more insight into the reasons for any differences. We interviewed Education officials about the process that the department used for the selection of both planning and implementation grantees.

To determine how the Promise Neighborhoods program coordinated with other Education programs and with the other federal agencies, including those involved in the White House Neighborhood Revitalization Initiative (NRI), we reviewed documentation of the NRI's efforts and interviewed agency officials participating in the NRI. We also interviewed cognizant officials at other agencies participating in the NRI. To assess Education's approach to evaluating the success of the grants, we reviewed grant monitoring reports, Education's performance measures, and related guidance for data collection for this program and interviewed agency officials responsible for evaluation, including technical assistance providers.

To determine the extent to which Promise grants enabled collaboration at the local level, we used GAO's prior work on implementing interagency collaborative mechanisms as criteria.¹ We compared the Promise grants' collaboration mechanisms to certain successful approaches used by select interagency groups and reviewed implementation grantees' application materials. Our 11 site visits provided additional insight into how selected grantees align services supported by multiple funding streams and delivered by multiple providers. Using survey responses from all planning grantees, we determined whether they have continued their efforts, whether they have implemented any of their strategies, and what, if any, interim results they have identified, regardless of whether they received implementation grants. Site visits provided illustrative examples of interim benefits and challenges.

We conducted this performance audit from February 2013 to May 2014 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

¹GAO, *Managing for Results: Implementation Approaches Used to Enhance Collaboration in Interagency Groups*, [GAO-14-220](#) (Washington, D.C.: Feb/ 14, 2014). To identify the approaches we selected four interagency groups that use key practices for enhancing and sustaining collaboration. To identify successful approaches, we reviewed agency documents and interviewed agency officials that participated in these groups.

Appendix II: Promise Neighborhood Grantees

Organization	Location	Year planning grant received	Year implementation grant received
Abyssinian Development Corporation	New York , NY (Harlem)	2010	
Amherst H. Wilder Foundation	St. Paul, MN	2010	
Athens Clarke County Family Connection Inc.	Athens, GA	2010	
Berea College	Clay, Jackson, and Owsley Counties, KY	2010	2011
Boys & Girls Club of the Northern Cheyenne Nation	Northern Cheyenne Reservation, MT	2010	
California State University East Bay	Hayward, CA	2010	2011
DC Promise Neighborhood, Inc.	Washington, DC	2010	2012
Community Day Care Center of Lawrence, Inc.	Lawrence, MA	2010	
Delta Health Alliance, Inc.	Indianola, MS	2010	2012
Dudley Street Neighborhood Initiative	Boston, MA	2010	2012
Lutheran Family Health Centers/ Lutheran Medical Center	New York , NY (Brooklyn)	2010	
Morehouse School of Medicine, Inc.	Atlanta, GA	2010	
Neighborhood Centers, Inc.	Houston, TX	2010	
Proyecto Pasotoral at Dolores Mission	Los Angeles, CA	2010	
The Guidance Center	River Rouge, MI	2010	
United Way of Central Massachusetts, Inc.	Worcester, MA	2010	
United Way of San Antonio & Bexar County, Inc	San Antonio, TX	2010	2011
Universal Community Homes	Philadelphia, PA	2010	
University of Arkansas at Little Rock	Little Rock, AR	2010	
Westminster Foundation	Buffalo, NY	2010	2011
Youth Policy Institute	Los Angeles, CA	2010	2012
Black Family Development	Detroit , MI	2011	
CAMBA	New York, NY (Brooklyn)	2011	
Campo Band of Mission Indians	Campo, CA	2011	
Catholic Diocese of Albany	Greenport, NY and Hudson, NY	2011	
Children Youth and Family Services	Charlottesville, VA	2011	
Community Action Project of Tulsa	Tulsa, OK	2011	
Thomas and Jeanne Elmezzi Foundation	New York, NY (Queens)	2011	
Martha O'Bryan Center	Nashville, TN	2011	
Mercer University	Macon, GA	2011	
Meriden Children First	Meriden, CT	2011	

Organization	Location	Year planning grant received	Year implementation grant received
Mission Economic Development Agency	San Francisco, CA	2011	2012
Northside Achievement Zone	Minneapolis, MN		2011
Ohio University	Glouster, OH	2011	
Reading and Beyond	Fresno, CA	2011	
SGA Youth and Family Services	Chicago, IL	2011	
South Bay Community Services	Chula Vista, CA	2011	2012
CASA de Maryland, Inc.	Langley Park, MD	2012	
Center for Family Services, Inc.	Camden, NJ	2012	
Cypress Hills Local Development Corporation	New York, NY (Brooklyn)	2012	
Penquis C.A.P., Inc.	Rockland, Cushing, Owls Head, St. George, Thomaston, and South Thomaston, ME	2012	
Mid-Iowa Community Action	Marshalltown, IA	2012	
Paskenta Band of Nomlaki Indians	Corning, CA	2012	
Rutgers, The State University	Newark, NJ	2012	
Texas Tech University	Lubbock, TX		2012
United Way of Northern Utah	Ogden, UT	2012	
University of Maryland Baltimore	Baltimore, MD	2012	
Renewal Unlimited, Inc.	Adams County, WI	2012	

Source: Department of Education data.

Appendix III: Goals, Results, and Performance Indicators for Promise Neighborhood Program

Table 10: Promise Neighborhoods Program’s Design for Achieving Its Goals

How Promise Neighborhoods will achieve its goal	Grant requirements supporting method of achieving goal
Identify and increase the capacity of eligible organizations focused on achieving results for children and youth throughout an entire neighborhood.	<ul style="list-style-type: none"> • Applicants must be a nonprofit, institution of higher education, or Indian tribe. • Applicants must be representative of the area to be served. • Applicant must already be providing at least one of the programs or services proposed in the cradle-to-career continuum in the neighborhood.
Building a complete continuum of cradle-through-college-to-career solutions of both educational programs and family and community supports with great schools at the center.	<ul style="list-style-type: none"> • Implementation grant applicants must develop an implementation plan based on a comprehensive needs assessment and prioritization analysis. Applicant must also describe how it built community support for and involvement in the development of the plan. • While grants are awarded to organizations already providing services in the community, the applications require a partnership with a target school serving the neighborhood that is either a persistently lowest-achieving or a low-performing school.
Integrating programs and breaking down agency “silos” so that solutions are implemented effectively and efficiently across agencies.	<ul style="list-style-type: none"> • Applicants must identify effective partner organizations and formalize these partnerships with memoranda of understanding. • Grant recipients are required to have a structure to hold partners accountable.
Developing the local infrastructure of systems and resources needed to sustain and scale up proven, effective solutions across the broader region beyond the initial neighborhood.	<ul style="list-style-type: none"> • Implementation grant applicants must include a plan to collect data on indicators at least annually and use data for learning, continuous improvement, and accountability. A longitudinal data system may provide some of this data. • Applicants must submit a list of proposed funds and in-kind donations to match the federal investment that it proposes to use to support its Promise Neighborhoods project.
Learning about the overall impact of the Promise Neighborhoods program and about the relationship between particular strategies in Promise Neighborhoods and student outcomes, including through a rigorous evaluation of the program.	<ul style="list-style-type: none"> • Implementation grant recipients must provide performance on indicators at least annually and submit longitudinal data to Education, which will be used to evaluate the program. • Grant recipients must also participate in a community of practice to solve persistent problems or improve practices among Promise Neighborhoods.

Source: GAO analysis of relevant *Federal Register* notices and other program documentation.

Table 11: Promise Neighborhoods Desired Outcomes and Indicators

Outcome	Indicator
Children enter kindergarten ready to succeed in school	Number and percent of children, from birth to kindergarten entry, who have a place where they usually go, other than an emergency room, when they are sick or in need of advice about their health.
	Number and percent of three-year-olds and children in kindergarten who demonstrate at the beginning of the program or school year age-appropriate functioning across multiple domains of early learning as determined using developmentally-appropriate early learning measures.
	Number and percent of children, from birth to kindergarten entry, participating in center-based or formal home-based early learning settings or programs, which may include Early Head Start, Head Start, child care, or preschool.
Students are proficient in core academic subjects	Number and percent of students at or above grade level according to state mathematics and reading or language arts assessments in at least the grades required by the Elementary and Secondary Education Act (3rd through 8th and once in high school).
Students successfully transition from middle school grades to high school	Attendance rate of students in 6th, 7th, 8th, and 9th grade.
Youth graduate from high school	Graduation rate
High school graduates obtain a postsecondary degree, certification, or credential	Number and percent of Promise Neighborhood students who graduate with a regular high school diploma and obtain postsecondary degrees, vocational certificates, or other industry-recognized certifications or credentials without the need for remediation.
Students are healthy	Number and percent of children who participate in at least 60 minutes of moderate to vigorous physical activity daily.
	Number and percent of children who consume five or more servings of fruits and vegetables daily.
Students feel safe at school and in their community	Number and percent of students who feel safe at school and traveling to and from school, as measured by a school climate needs assessment.
Students live in stable communities	Student mobility rate
Families and community members support learning in Promise Neighborhood schools	For children birth to kindergarten entry, the number and percent of parents or family members who report reading to their children three or more times a week.
	For children in kindergarten through 8th grades, the number and percent of parents or family members who report encouraging their children to read books outside of school.
	For children in the 9th to 12th grades, the number and percent of parents or family members who report talking with their child about the importance of college and career.
Students have access to 21st century learning tools	Number and percent of students who have school and home access (and percent of the day they have access) to broadband internet and a connected computing device.

Source: Relevant *Federal Register* notices.

Appendix IV: Comments from the Department of Education



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF INNOVATION AND IMPROVEMENT

April 25, 2014

Ms. Jacqueline M. Nowicki
Acting Director, Education, Workforce,
and Income Security Issues
Government Accountability Office
Washington, DC 20548

Dear Ms. Nowicki:

Thank you for the opportunity to comment on the Government Accountability Office (GAO) draft report entitled, "Promise Neighborhoods Promotes Collaboration, but Needs National Evaluation Plan." While the Department of Education (the Department) appreciates the positive aspects of the Promise Neighborhoods program highlighted in the report, GAO fails to provide critical information needed to better understand the Department's response and approach to the recommended Executive Actions. Before responding to GAO's Recommendations for Executive Action, we would like to offer additional information on the background of the Promise Neighborhoods program and the communication of expectations to the grantees related to future funding.

I. BACKGROUND ON THE PROMISE NEIGHBORHOODS PROGRAM

The Promise Neighborhoods program is a place-based initiative intended to significantly transform neighborhoods of concentrated poverty into neighborhoods of promise by improving the educational and developmental outcomes of the children and families living in these communities. The Promise Neighborhoods program provides critical support for the planning and implementation of comprehensive services ranging from early learning, K-12 education, to college and career support. This includes programs to improve the health, safety, and stability of neighborhoods, as well as to boost family engagement in student learning and improve access to learning technology. By providing support, resources, and guidance to the Promise Neighborhoods grantees with their planning and implementation efforts, the Department has demonstrated its commitment to ensuring that all children and youth growing up in Promise Neighborhoods have access to excellent schools and strong systems of family and community support.

Through the Promise Neighborhoods program, the Department has established a meaningful approach to supporting, improving, and transforming the educational and developmental outcomes of children and youth in our most distressed communities. In the 12 communities with funds to implement their plans, we are seeing the acceleration of the coordination and alignment

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of early childhood services. These communities are expanding and enhancing services by leveraging the resources and capacity of partners to improve both the quality of and access to services. Examples include the additional offering of parenting classes; an increase in the number of slots for early childhood education; and enhancements to adult literacy programs. In

the report, GAO acknowledges that the Promise Neighborhoods program embodies, through its grant requirements, some of the leading practices (e.g., establishing common outcomes, leveraging resources, and tracking performance) and approaches previously identified by GAO as necessary to enhancing and sustaining collaboration among partners. GAO also states in the report that the Promise Neighborhoods program is distinct from other federal programs in that it provides funds for organizations to create partnerships, facilitate collaboration, and use federal grant funds in a coordinated manner to improve services and reduce overlap between programs. Like GAO, we also believe these partnerships are critical to scaling up and sustaining change in Promise Neighborhoods.

II. AREAS FOR IMPROVEMENT IDENTIFIED IN THE REPORT

GAO identifies many of the strengths of the Promise Neighborhoods program in the report. Several areas where improvement can be made are also identified. We will consider these areas for improvement carefully as we respond to the report, continue to support grantee efforts, and administer the program. One area in particular where the Department would like to offer additional information is our communication to grantees on future funding.

The report does not provide a complete and accurate picture of the Department's efforts to convey clear expectations to the Promise Neighborhoods grantees, nor does it discuss the funding history for this program and its impact on the number and timing of the grant awards made. GAO states in the report that the planning grantees may have been better served had the Department provided an earlier and more transparent assessment of their chances to receive funding for implementation. However, an early assessment would have been premature and unfair, and grantees knew that there was no guarantee of further funding.

Congress, beginning in fiscal year (FY) 2010, has funded the Promise Neighborhoods program for the past five years. However, with the exception of FY 2010, the Promise Neighborhoods program's annual appropriation has been much lower than the President's budget request for the program. For the past three years, this program has been level-funded, receiving \$57–\$60 million annually, which is only sufficient to cover current implementation grantees' continuation costs and to provide technical assistance to support the existing planning and implementation grantees. In FY 2014, for example, the President's budget requested \$300 million for the program to make grant awards (both planning and implementation grants); to provide technical assistance to the grantees; and to support a national evaluation of the program. Yet in FY 2014, the program only received \$57 million. Due solely to a lack of available funds, no new planning or implementation grants have been awarded since 2012.

This financial context is important and underscores the limited control the Department has over various issues noted in the GAO report, including: the total number of grants made in any given year; the amount of funding available to award grants; the amount of funding available to provide technical assistance and support a national program evaluation; and the timing of the

grant awards. Due to these factors, in any given year in which grant awards are made, the Department does not know—and therefore cannot communicate to potential applicants—the amount of funding available or the number of grant awards anticipated in the following year.

The Department, beginning with the first Promise Neighborhoods planning competition in FY 2010, and in subsequent years, has consistently and clearly communicated to grantees about the uncertainties associated with future funding under this program. The Department’s efforts to communicate these expectations are noted in all grant competition documents created for potential applicants beginning with the FY 2010 Notice Inviting Applications (NIA) and the Frequently Asked Questions (FAQs) Guidance. These documents, coupled with the pre-application webinar series, are the earliest vehicles the Department has to communicate with potential applicants (including current grantees that intend to submit an application).

Since FY 2010, each Promise Neighborhoods NIA has included an accurate estimate of the amount of funding available, the average size of awards, and the number of awards to be made. Furthermore, all NIAs for this program (both planning and implementation) address the issue of future funding and contain language that states, “In subsequent years, contingent on the availability of funds,” the Department intends to conduct competitions or may make additional awards from the list of unfunded applicants. The Department further elaborates on this by including a section in the FAQs Guidance entitled, “Future Competitions,” which states that planning grantees will not automatically receive implementation grants. It also clarifies that planning grantees will be required to compete for implementation grants alongside applicants who did not compete for or receive a planning grant.

To further demonstrate the Department’s effort to communicate expectations to potential planning grantees regarding their chances of receiving implementation funding, the Department also required the planning grantees to develop memoranda of understanding (MOUs) with key partners. Since this was a requirement in the planning phase, all planning grantees understood that the obligation of the partner organizations to sign the MOUs was not contingent upon the receipt of federal funding for all the reasons cited earlier regarding the uncertainty of future federal funding.

III. COMMENTS ON SPECIFIC RECOMMENDATIONS

Clarify program guidance about planning and implementation grants to provide reasonable assurance that planning grantees are better prepared to continue their efforts in the absence of implementation funding. Additional guidance could include encouraging grantees to set aside a small amount of the grant to identify and deliver early, tangible benefits to their neighborhoods.

As funding becomes available to support new planning and implementation grants, the Department will continue to emphasize in its communications to all interested planning applicants through the vehicles discussed earlier (i.e., NIA, FAQs Guidance, pre-application webinars, MOU requirement) that federal funding to support continued implementation efforts is contingent upon the availability of funds. In addition, during the post-award phase, Department staff will provide more targeted technical assistance and guidance to the planning grantees regarding strategies to consider for continuing their efforts absent implementation funding.

GAO also notes that the Department could include additional guidance that encourages grantees to set aside funding to identify and deliver early, tangible benefits to their neighborhoods. Currently, grantees are free to use Promise Neighborhoods funds to support some of these early benefits described in the GAO report as long as these efforts are: directly related to either the planning process or the execution of an implementation plan; and are an allowable use of funds under federal law. In fact, many of the grantees have opted to use their matching funds to support these types of activities. While the Department will continue to work with the grantees to clarify allowable uses of Promise Neighborhoods funds, we believe, and have stated in the NIA for the implementation competition, that grantees are best positioned to determine the allocation of their grant funds.

Develop and disseminate to grantees on an ongoing basis an inventory of programs and resources that can contribute to the Promise Neighborhoods program's goal to better support coordination across federal agency lines.

Currently, Department staff along with the Promise Neighborhoods program's technical assistance providers, disseminates resources to the Promise Neighborhoods grantees that could enhance or expand their current efforts, including external funding opportunities. In addition, Department staff will work with the Promise Neighborhoods program's technical assistance providers to create a mechanism to distribute, on a regular basis, a comprehensive list of external funding opportunities, programs, and resources to better support the grantees' implementation efforts.

Develop a plan to use the data collected from grantees to conduct a national evaluation of the program.

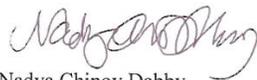
The Department will consider options for how and whether it can use the data collected from grantees to conduct a national evaluation. As GAO acknowledges, there have been some challenges in the data collection, and grantees have reported some difficulties in collaborating with partners about data, particularly because of privacy concerns related to some of the data collection. As a first step in determining whether the data can be used for a descriptive study and to create a restricted use data set, the Department will move ahead with a systematic examination of the reliability and validity of this data. A data set would only be made available to researchers after the Department has determined that the data quality is adequate and appropriate for research; analyzed the data, taking into account the privacy concerns; and considered the release of its own report.

Additionally, the Department would need to receive funding to support an evaluation. Thus far, sufficient funds have not been secured to allow us to fund grantees, provide technical assistance, and conduct an evaluation. If additional funding becomes available and the issues noted above can be resolved, the Department will move to develop plans for a national evaluation of the Promise Neighborhoods Program.

IV. CONCLUSION

Thank you for the opportunity to provide a written response to the draft report. We strongly encourage GAO to consider the information provided in this response when preparing the final report. As indicated, we will use the information in this report to continue to improve the Department's oversight to help ensure the success of the Promise Neighborhoods program.

Sincerely,



Nadya Chinoy Dabby
Assistant Deputy Secretary for Innovation and Improvement

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

Jacqueline M. Nowicki (617) 788-0580

Staff Acknowledgments

In addition to the contact named above, Elizabeth Sirois, Assistant Director; Jacques Arsenault; Aimee Elivert; and Lara Laufer made key contributions to this report. Also contributing to this report were James Bennett, Deborah Bland, Mallory Barg Bulman, Holly Dye, Alex Galuten, Jean McSween, Matthew Saradjian, and Sarah Veale.

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