



REPORT TO THE CONGRESS

Problems In Administering Programs To Improve Law Enforcement Education - 3

Law Enforcement Assistance Administration
Department of Justice

*BY THE COMPTROLLER GENERAL
OF THE UNITED STATES*

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COMPTROLLER GENERAL OF THE UNITED STATES
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To the President of the Senate and the
Speaker of the House of Representatives

This report discusses problems that the Law Enforcement Assistance Administration experienced in administering programs to improve law enforcement education and suggests ways to correct these problems so that students and the criminal justice system can derive the maximum benefits from the programs.

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

Copies of this report are being sent to the Director, Office of Management and Budget; the Attorney General; and the Administrator, Law Enforcement Assistance Administration.

A handwritten signature in dark ink, reading "Thomas A. Alford", is positioned above the printed title of the Comptroller General.

Comptroller General
of the United States

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ABBREVIATIONS

GAO	General Accounting Office
JFMIP	Joint Financial Management Improvement Program
LEAA	Law Enforcement Assistance Administration
LEEP	Law Enforcement Education Program

COMPTROLLER GENERAL'S
REPORT TO THE CONGRESS

PROBLEMS IN ADMINISTERING
PROGRAMS TO IMPROVE LAW
ENFORCEMENT EDUCATION
Law Enforcement Assistance
Administration
Department of Justice

D I G E S T

WHY THE REVIEW WAS MADE

GAO reviewed the following three law enforcement education programs to determine how they were administered and whether they were benefiting students and the criminal justice system:

- Loans and grants to students employed or preparing for employment in criminal justice (Law Enforcement Education Program).
- Internships awarded to students who want criminal justice work experience (Internship Program).
- Improvement of schools' criminal justice curriculums (Educational Development Program).

From fiscal year 1969 through fiscal year 1974, the Law Enforcement Assistance Administration had about \$161.5 million to spend on these programs at about 1,000 colleges and universities with over 100,000 students.

FINDINGS AND CONCLUSIONS

Many persons were attracted to criminal justice careers or improved their police, court, or correction jobs because of the law enforcement education programs.

However, management of the programs before 1974 was inadequate. Problems resulted from

- failure to establish clear-cut goals and objectives,
- frequent organizational changes,
- numerous and sometimes questionable policy changes, and
- insufficient staff.

These resulted in:

- Untimely and subjective distribution of funds to schools, inefficient use of funds, and large unspent balances at the end of the fiscal years.
- Deficiencies in accounting for participants so that the

the agency was unable to hold individuals accountable for receiving education funds.

--Insufficient program monitoring.

--No program evaluation.

In January 1974 the Law Enforcement Assistance Administration, partly in response to GAO's concerns, requested the help of the Federal Government's Joint Financial Management Improvement Program to review most financial aspects of the Law Enforcement Education Program.

After the program staff issued its April 1974 report, the Law Enforcement Assistance Administration began to correct many of its financial and management problems.

Impact of the Law Enforcement Education Program

In January 1974 GAO sent questionnaires to a random sample of graduates from the Law Enforcement Education Program. Among other things, the results showed:

--Persons, other than police, working in parts of the criminal justice system were not taking full advantage of the program.

--Although court, probation and parole, and corrections employees accounted for 33 percent of all criminal justice employees as of October 1972,

only 18 percent of the employed respondents were working in these areas.

--Most respondents who attained degrees received bachelor degrees--253 of 463, or 54 percent.

--Generally, employed respondents other than police reached a higher level of education than respondents who were police.

--Respondents were attracted to criminal justice work because of their participation in the Law Enforcement Education Program. About 66 percent now working in the criminal justice field who had no prior criminal justice experience said their participation in the program influenced their decision to work in the field and 97 percent of these intended to make it their career.

The questionnaire results showed that about 39 percent of the respondents without prior criminal justice experience who actively looked for work in the criminal justice field had failed to find employment at least 6 months after they graduated. Sixty-five percent of the women could not find criminal justice jobs compared to 32 percent of the men.

Overall, about 48 percent of the graduates with no prior criminal justice experience did not obtain criminal justice employment. This adversely affects

the program's objectives and means that improvements are needed.

About 86 percent of the respondents who were working and had prior criminal justice experience were police. Most respondents with no previous work experience found criminal justice employment with police agencies.

Respondents said courses they took had improved their knowledge and understanding of matters in their criminal justice occupations. Areas in which the highest proportion of respondents believed their courses had improved their competence were

--human relations principles (84 percent),

--community relations (82 percent),

--recognizing and dealing with evidence of deviant behavior (81 percent),

--legal aspects of arrest, etc. (80 percent), and

--legal definitions of crime and crime participants (80 percent).

This suggests that schools are emphasizing the criminal justice areas with widest applicability. (See ch. 2.)

Administrative problems in the Law Enforcement Education Program

Until August 1973, the Law

Enforcement Assistance Administration did not have accurate information on how much of the program's funds schools had spent or what unused funds they were holding.

GAO determined that the Federal Government incurred unnecessary interest costs of at least \$169,000 because of the amount of unused funds which remained at many schools for fiscal years 1969-73.

The agency's management shortcomings caused a gradual increase in the number of student promissory notes for which the agency could not properly account. The number of unfiled notes by August 1973 was about 250,000.

In short, the agency had inadequate financial and administrative control over the program. (See ch. 3.)

Delays in implementing the Internship and Educational Development Programs

The basic problem with both programs has been delays in distributing funds. Through fiscal year 1973, \$1 million had been appropriated for the Internship Program but \$375,000 remained to be spent. Before fiscal year 1974 only \$5,000 of the \$3.25 million appropriated for the Educational Development Program had been spent. In fiscal year 1974, \$5 million was awarded under the program to seven universities.

The agency had been extremely slow in carrying out the intent

the Congress had when it established these programs in 1971. (See pp. 38 to 42.)

Actions to improve administration

In May 1974 the Law Enforcement Assistance Administration began to correct many of the problems noted, estimating the work would take about 14 months.

As of November 1974, it had:

- Instituted improved accounting procedures for reducing excess cash balances at schools.
- Instituted improved procedures for processing and filing student promissory notes, thus eliminating backlogs.
- Developed design specifications for an improved Law Enforcement Education Program billing and collections system.

As a result, institutional fund balances have been reduced and the backlog of unfilled promissory notes has been eliminated.

The Law Enforcement Assistance Administration, however, may not have adequate staff in some of its regional offices to effectively monitor institutional corrective actions if the new accounting procedures indicate that the institutions are not managing their funds properly. (See pp. 33 to 36.)

RECOMMENDATIONS

The Attorney General should direct the Administrator, Law Enforcement Assistance Administration, to:

- Provide information on employment opportunities to Law Enforcement Education Program participants and determine what factors are preventing many graduates with no criminal justice work experience from finding criminal justice employment.
- Consider how career counseling and placement services might be provided to Law Enforcement Education Program participants to insure that criminal justice agencies will benefit from their knowledge and training.
- Monitor the effectiveness of each regional office staff in carrying out its Law Enforcement Education Program management responsibilities and determine whether some regions need additional staff.

AGENCY ACTIONS AND UNRESOLVED ISSUES

The Department of Justice generally agreed with GAO's findings, conclusions, and recommendations. (See app. I.)

It stated that the Law Enforcement Assistance Administration

was proposing certain policy and administrative changes for fiscal year 1976 to provide (1) better assurance that students in the Law Enforcement Education Program are committed to and find criminal justice work and (2) more effective program and financial management in its headquarters and regional offices.

MATTERS FOR CONSIDERATION
BY THE CONGRESS

Steps now underway to improve the law enforcement education programs should be completed

by the fall of 1975.

GAO recommends that the cognizant appropriations and legislative committees discuss the results of these improvement efforts with Department of Justice officials to determine whether appropriate corrective actions have been taken. To facilitate such a determination, the appropriate committees could request the Attorney General to review the Law Enforcement Assistance Administration's management of its education programs and report to the committees by the end of fiscal year 1976.

CHAPTER 1

INTRODUCTION

To improve the Nation's criminal justice systems, the Law Enforcement Assistance Administration (LEAA) of the Department of Justice provides funds to institutions of higher education primarily for

- making loans and grants to eligible students employed (inservice) or preparing for employment (preservice) in criminal justice,
- awarding internships to students interested in obtaining criminal justice work experience, and
- improving the schools' criminal justice curriculums.

We reviewed LEAA's educational assistance programs to determine whether students and the criminal justice system were benefiting from LEAA educational assistance and how well LEAA was administering the programs.

The Omnibus Crime Control and Safe Streets Act of 1968, as amended, created LEAA and authorized it to help State and local governments reduce crime by increasing the effectiveness of the criminal justice system. Most LEAA assistance is provided through a State criminal justice planning agency which, in conjunction with local planning groups, (1) determines how the State will use LEAA funds and (2) administers the program.

For fiscal years 1969-74, the Congress appropriated about \$2.6 billion for States' use. LEAA is the sole administrator of its educational assistance programs, however, and the institutions of higher education receive funds directly from it. The State criminal justice planning agencies' role in these programs is very limited.

For fiscal years 1969-74, LEAA had about \$161.5 million to spend as follows:

- \$154.8 million for loans and grants to students.
- \$1.5 million for internships for students to obtain criminal justice experience.
- \$5.2 million for educational development at selected schools.

LEAA had about 378 staff members at its headquarters and about 308 in its 10 regional offices as of January 1975. As

of November 1974, only three headquarters staff members were responsible for administering its educational assistance program. To help schools administer funds awarded them, LEAA has encouraged each regional office to employ at least one specialist concerned with the educational needs of the criminal justice community within its jurisdiction.

EDUCATION PROGRAMS

Law Enforcement Education Program

LEAA provides most of its educational assistance funds to schools under the Law Enforcement Education Program (LEEP). The schools use the funds to make loans and grants to eligible inservice or preservice students in criminal justice.

LEAA's Office of Regional Operations is responsible for allocating LEEP funds among 10 regional offices. The regional offices determine, partially on the basis of recommendations received from the State criminal justice planning agency, how much each participating school will receive.

LEEP funding and the number of participating schools and students by category are shown below.

<u>Fiscal year</u>	<u>Amount</u>	<u>Number of schools</u>	<u>Number of students</u>		
			<u>Pre- service</u>	<u>In- service</u>	<u>Total</u>
(000 omitted)					
1969	\$ 6,500	485	1,248	19,354	20,602
1970	18,000	735	7,000	43,000	50,000
1971	21,250	890	13,327	59,953	73,280
1972	29,000	962	16,000	71,000	87,000
1973	40,000	993	19,000	76,000	95,000
1974	40,000	1,030	20,000	80,000	100,000

Total \$154,750

Internship Program

The 1971 amendments to the Omnibus Crime Control and Safe Streets Act established the LEAA Internship Program, which provides grants to students desiring criminal justice work experience. LEAA was authorized to award grants of up to \$65 a week to college students to work in criminal justice agencies for at least 8 weeks (for a minimum of 30 hours per week) either during their summer recesses or while they are on leaves of absence from their degree programs. The employing agencies can supplement the internship grant by providing salaries to participants.

LEAA's headquarters office allocates the internship funds to the 10 regional offices, which select and award funds to schools. The schools, in turn, obtain internship positions for their students. The program has grown steadily since its inception in fiscal year 1971 when approximately \$119,000 was awarded to 262 interns from 52 schools. During fiscal year 1974 LEAA spent about \$800,000 at 140 schools for about 1,000 interns.

Educational Development Program

The 1971 amendments also authorized LEAA to make grants to or enter into contracts with institutions of higher education, or combinations of such institutions, to help them plan, develop, improve, or carry out programs or projects for developing or demonstrating improved methods of law enforcement education.

LEAA has implemented the program by providing 3-year grants to seven institutions to promote the development and improvement of their criminal justice doctoral studies programs. Since fiscal year 1971, LEAA has allocated \$5.2 million to Michigan State University, the University of Maryland, Arizona State University, Eastern Kentucky University, the University of Nebraska, Northeastern University, and Portland State University.

CHAPTER 2

IMPACT OF LEEP

LEEP's objective is to improve the criminal justice system by providing educational opportunities to persons employed in, or considering, criminal justice careers. Specifically, the program was designed to

- attract persons to careers in criminal justice, primarily at the State and local levels, and
- help persons already in the criminal justice system to do their jobs better.

To determine whether these objectives were being accomplished, we randomly selected 550 individuals who had successfully completed studies and attained certificates or degrees with LEEP assistance. We queried them on their experiences in the program, their employment status, what they learned, and how LEEP affected their decision to enter or remain in a criminal justice career. (See app. II for details on our approach.)

Most graduates believed they benefited from participation in the program. Specifically:

- The LEEP graduates believed that participation in LEEP improved their knowledge of criminal justice work, enhanced their understanding of human behavior, and helped them deal with others on the job.
- Availability of LEEP funds motivated individuals, who otherwise could not have afforded it, to pursue higher education.
- Most graduates who had no criminal justice work experience before taking LEEP courses and who later obtained employment with a criminal justice agency believed LEEP influenced their career decision.
- LEEP graduates believed that participation in LEEP improved their knowledge and understanding of matters important in criminal justice work.
- A significant percentage of graduates with no criminal justice work experience, especially women, had difficulty obtaining jobs in the criminal justice system.
- Less than half of the graduates attributed their promotion potential and/or pay increases to LEEP.

--Proportionately, police are participating in LEEP much more than court, corrections, and probation and parole employees.

TYPE OF STUDENTS RECEIVING DEGREES UNDER LEEP

An objective of LEEP is to strengthen the court, probation and parole, correctional, and police systems by encouraging persons to obtain education in these areas.

Although court, probation and parole, and corrections employees accounted for 33 percent of all criminal justice employees as of October 1972, only 18 percent of our LEEP-trained respondents employed in criminal justice were working in these areas. Of the respondents who had prior criminal justice experience, only 14 percent of those then working in criminal justice were working in nonpolice areas. Of those with no prior criminal justice experience, 39 percent of those working in criminal justice were working in nonpolice areas. Although the proportion of LEEP participants should not necessarily be directly related to the proportion of people working in the various parts of the criminal justice system, the results indicate that staff in nonpolice areas of the system are not taking full advantage of the program.

TYPES OF DEGREES EARNED

Most LEEP graduates have received bachelor degrees. The following table shows degrees and certificates received by graduates.

	<u>Preservice</u>		<u>Inservice</u>		<u>Total</u>	
	<u>Number</u>	<u>Percent</u>	<u>Number</u>	<u>Percent</u>	<u>Num- ber</u>	<u>Per- cent</u>
Masters	6	4.1	32	10.1	38	8
Bachelor	117	80.1	134	42.3	a/253	54
Associate	22	15.1	138	43.5	160	35
Certificate	1	.7	4	1.3	5	} 3
Other (note b)	0	0	6	1.9	6	
No response	0	0	3	.9	3	
Total	<u>146</u>	<u>100</u>	<u>317</u>	<u>100</u>	<u>465</u>	<u>100</u>

a/Two graduates who did not indicate whether they had been pre-service or inservice students also earned bachelor degrees.

b/Indicated other types of degrees but did not specify type.

Of the masters degrees, 24 were earned by individuals with more than 5 years of criminal justice experience. Eighty-four percent were earned by inservice LEEP students.

Eighty percent of the preservice respondents and 42 percent of the inservice respondents earned bachelor degrees. Inservice respondents earned most of the associate degrees.

Twenty-one percent of the respondents with masters degrees (8 of 38) are receiving LEEP assistance for additional courses, and 32 percent of those with masters degrees (12 of 38) plan to request financial assistance for additional study. Of those with bachelor degrees, about 22 percent (56 of 253) are receiving LEEP financial assistance and 53 percent plan to request further assistance. Of those with associate degrees, about 58 percent (93 of 160) are receiving assistance and 75 percent plan to request further financial assistance.

The following table shows the types of degrees earned by respondents working in the various criminal justice fields.

Degree	Police		Probation or parole		Courts		Corrections		Total	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Masters	19	6	6	33	4	25	2	7	31	9
Bachelor	134	46	12	67	10	63	18	60	174	49
Associate	130	44	0	0	2	12	8	27	140	39
Certificate	5	2	0	0	0	0	0	0	5	1
Other (note a)	5	2	0	0	0	0	2	6	7	2
Total	293	100	18	100	16	100	30	100	b/357	100

a/Includes those who did not specify degree obtained.

b/Excludes those not employed in criminal justice jobs.

About 33 percent of our respondents working in probation or parole and about 25 percent of those working in the courts had attained masters degrees. About 46 percent of the degrees attained by police were below the bachelor level. Although the number of LEEP graduates working in nonpolice areas is relatively small compared with those in police work, they have generally obtained a higher level of education.

CRIMINAL JUSTICE EMPLOYMENT

The analyses that follow show that LEEP's objective of attracting people to criminal justice careers is being achieved but that more attention needs to be given to helping preservice students find jobs in criminal justice agencies.

Attraction to criminal justice careers

We asked the 59 respondents who are now working in criminal justice but who had no such experience before receiving LEEP funds to indicate the extent to which LEEP courses had influenced their career decisions. Sixty-six percent (39)

said LEEP courses significantly influenced their decision, and 97 percent of this group said they would or probably would continue their careers in criminal justice. Overall, most respondents who are working in criminal justice said they would probably continue their careers in the field.

About 96 percent of LEEP graduates who are police said they would probably pursue careers in criminal justice. A large portion of LEEP graduates who are currently working in nonpolice areas stated that they too would probably pursue careers in criminal justice (corrections, 83 percent; probation and parole, 81 percent; courts, 94 percent). A majority of the nonpolice graduates considered LEEP courses to have strongly influenced this decision. However, most police graduates said LEEP was not a strong influence, perhaps because they had already decided on their careers before entering the program.

Difficulties in finding jobs

Some of the benefits from LEEP have been lost because of the absence of a system to help program participants find criminal justice jobs. Ninety-six respondents who had no prior criminal justice experience before they took LEEP courses actively looked for criminal justice employment. About 39 percent (37 of 96) of these respondents failed to find such employment. Some of these cited a need for placement assistance. The problem is more serious among women; 65 percent of the women respondents could not find jobs compared with 32 percent of the men. (See app. II, table D.)

Some of the comments we received follow:

"I have made over 200 applications to enter Federal, state, or local law enforcement and socially related agencies and have been rejected for many reasons--wrong sex--no money for such future employment--job eliminated--nothing available."

"When graduated from college, I applied for jobs in law enforcement state, local, federal but could find nothing--needed experience or no openings."

"I have passed the police officers recruitment test, written and oral, I have passed the FSEE [intern-management] test--I am a magna cum laude graduate--I am a veteran--I don't know why I can't get a job."

The following table shows the status, after obtaining a degree or certificate, of 146 LEEP graduates with no prior criminal justice experience. In all cases, at least 6 months had elapsed from the time they graduated until they responded to our questions. Regardless of whether they actively sought criminal justice jobs, 48 percent of the graduates were not employed in criminal justice agencies. This adversely affects the program's objectives and means that improvements are needed.

<u>Status</u>	<u>Number of graduates</u>	<u>Percent</u>
Employed in criminal justice agencies	59	40
Not employed in criminal justice agencies	70	48
Pursuing additional education	<u>17</u>	<u>12</u>
Total	<u>146</u>	<u>100</u>

Our questionnaire did not ask graduates specifically why they did not obtain employment or whether they had rejected any offers. However, some respondents did comment on this matter. Although many reasons may account for an individual's not being able to obtain a job, our respondents did not indicate that their failure to find jobs was because of low scholastic achievement or their own highly selective requirements.

Rather, graduates were sometimes told that no openings existed or that prior criminal justice experience was required.

In many instances, both respondents who could not find jobs and those who had jobs said that LEAA should help match graduates with existing criminal justice needs. For example:

"The money received was a great assistance in my finishing school. However, I do feel there needs to be more emphasis on placement after graduation. I had to take a job out of the criminal justice area because of poor placement assistance at my school. I just fell into the job I now have--I looked over two states for employment in the field and had no luck."

"I had found it extremely difficult to find a permanent job within the criminal justice system upon graduation with a BS degree. * * * I strongly recommend that LEEP should organize some type of regional offices throughout our nation in order to assist the many desperate people who seek employment."

"LEEP possibly could provide employment counselling service."

"There should be a placement job program for future employment or present part time."

"LEEP should incorporate a more effective vocational guidance program and placement service."

To insure that the benefits of a criminal justice education are applied, LEAA must determine criminal justice manpower needs and devise a way to advise LEEP graduates where these needs exist. Although in early 1974 LEAA was planning to develop such data in accord with the requirements of the Crime Control Act of 1973, an LEAA official told us such a study would not be complete for 2 years.

Nature of employment

What types of jobs did those who were already working or who had found work in the criminal justice system have, and at what level of government were they working?

Types of jobs

Most graduates (86 percent) who had previous criminal justice experience were police. Most graduates (61 percent) with no such previous work experience also found criminal justice employment with police agencies.

The distribution of new criminal justice employees entering various professional areas and the corresponding distribution for respondents with previous criminal justice experience follow.

	Prior experience		No prior experience	
	Number	Percent	Number	Percent
Police	256	86	36	61
Probation/parole	9	3	9	15
Courts (note a)	13	5	3	5
Corrections	19	6	11	19
Total	297	100	59	100

a/Because one court employee did not state whether he was an inservice or preservice graduate, he is not included in this table.

Although both inservice and preservice graduates were more likely to enter police work than any other criminal justice employment, preservice graduates were more likely to enter other areas of the criminal justice system. (See app. II, table A, for statistical tests used.)

Level of employment

One objective of LEEP is to provide education to those working or planning to work at the State, county, and local levels of the criminal justice system. Our survey showed that 47 percent of all LEEP graduates were employed at the local level and 32 percent at the State and county levels. Three percent were employed at the Federal level.

LEEP inservice and preservice graduates' employment by level of government

----- (percent) -----

Agency	Local	County	State	Federal	No response	Total (note a)
Police	45	13	6	2	16	82
Probation/parole	0	2	2	0	1	5
Courts	1	3	0	0	0	5
Corrections	1	2	4	1	0	8
Total (note a)	47	20	12	3	18	100

a/May not add due to rounding.

Our survey also showed that county and local government agencies are the major employers of preservice LEEP graduates, as shown in the following table.

Criminal justice employment
of preservice graduates

----- (percent) -----

<u>Agency</u>	<u>Local</u>	<u>County</u>	<u>State</u>	<u>Fed- eral</u>	<u>No re- sponse</u>	<u>Total (note a)</u>
Police	29	22	3	3	3	61
Probation/parole	0	9	3	0	3	15
Courts	0	3	0	2	0	5
Corrections	0	5	10	3	0	19
Total (note a)	<u>29</u>	<u>39</u>	<u>17</u>	<u>8</u>	<u>7</u>	<u>100</u>

a/May not add due to rounding.

RELEVANCE OF COURSES TO WORK

Generally, LEEP graduates believed their education provided useful knowledge and helped them in their jobs, particularly by improving their understanding of human relations and performance of criminal justice tasks.

To determine to what extent LEEP courses were helping graduates employed in criminal justice jobs to increase their technical knowledge and human understanding, we asked them to specify, for each of 20 criminal justice or human relations areas, whether the area was important in their jobs and whether LEEP courses had provided useful knowledge in the area. Appendix III lists all 20 areas.

At least 70 percent of the respondents considered each area, except preparing inmates for parole, to be at least somewhat important in performing their jobs. Over 90 percent indicated that the following areas were important.

<u>Area</u>	<u>Percent</u>
Good human relations principles	97
Ability to communicate with supervisors and co-workers	96
Community relations	95
Preparation of records and reports	95
Legal aspects of arrest, escape, detainment, search, etc.	94
Legal definitions of crime and participants in crime	93
Recognizing and dealing with evidence of deviant behavior	91

In general, the proportion of respondents who believed that LEEP had improved their knowledge and understanding in an area was less than the proportion who indicated that the area was important in their work. The areas in which the highest proportion of respondents felt LEEP had improved their competence were as follows.

<u>Area</u>	<u>Percent</u>
Human relations principles	84
Community relations	82
Recognizing and dealing with evidence of deviant behavior	81
Legal aspects of arrest, escape, detainment, search, etc.	80
Legal definitions of crime and participants in crime	80

Apparently, the higher the proportion of respondents who believed the area was important, the higher the proportion of respondents who believed they had received useful training in the area. This suggests that the schools are emphasizing the criminal justice areas with widest applicability.

The areas in which there seem to be the largest differences between importance of the area and receipt of education in the area are shown below.

	<u>Percent who believed area to be important</u>	<u>Percent who received useful education in area</u>
Care and use of firearms	78	31
First aid	76	30
Methods of restraint	82	45
Prevention and suppression of riots and disturbances	79	50
Control of contraband	77	56
Familiarity with black ghetto language and customs	81	60
Recognizing and dealing with drug dependency	87	66

Most of these areas where the differences are greatest are likely to be taught by individual criminal justice agencies as part of internal training programs; therefore, the schools cannot be criticized for not adequately addressing most of the areas.

To determine the extent to which LEEP courses provided useful information in each criminal justice field, employees in each field were asked, for various specialized areas, whether knowledge of that area was useful in their specific jobs and if the LEEP training they received improved their ability or knowledge. The following results show that in most instances LEEP courses met the employees' needs.

Educational Areas GAO Believed
Relevant to Court Employees

<u>Area</u>	<u>Percent of court employees who believed they needed education in the area and who received useful education</u>
Legal definitions of crime and participants in crime	100
Legal aspects of arrest, escape, detainment, search, etc.	93
Current issues in court reform	93
Legal aspects of sex offenses	91

Educational Areas GAO Believed
Relevant to Probation and Parole Employees

<u>Area</u>	<u>Percent of probation and parole employees who believed they needed education in the area and who received useful education</u>
Legal aspects of pardon, probation, parole	80
Counseling	71
Rehabilitative vocational education	62
Religious motivation in rehabilitation	56
Preparing inmates for parole	42

Educational Areas GAO Believed
Relevant to Corrections Employees

<u>Area</u>	<u>Percent of corrections employees who believed they needed education in the area and who received useful education</u>
Facilities, resources, and job functions in institutions	82
Dealing with conflicts and tensions in an institution	78
Maintenance of resident dis- cipline in an institution	74
Legitimate use of force against an inmate	64

Educational Areas GAO Believed
Relevant to Police Employees

<u>Area</u>	<u>Percent of police employees who believed they needed education in the area and who received useful education</u>
Community relations	83
Dealing with conflicts and tensions in a neighborhood	80
Crowd dispersal	64
Prevention and suppres- sion of riots and dis- turbances	61
Use and care of firearms	38
First aid treatment	35

IMPACT OF LEEP ON PROMOTION POTENTIAL
OR PAY INCREASES

Although promotions and pay increases are given for many reasons, we thought that program participants' views on the effect of LEEP on their career advancement would be useful. We asked the following questions:

1. Does your employer have an incentive pay and promo-
tion program which rewards additional education?
2. If you work in criminal justice, did your LEEP-
supported courses result in a promotion for you?

3. Did your LEEP-supported study result in a pay increase?

About 31 percent of the respondents worked for criminal justice organizations having pay and promotion systems which rewarded them for continuing their education. Of the 328 respondents who answered the question about promotions, 42 percent believed their promotions were, or probably were, attributable to their participation in LEEP. For the 348 who answered the question about pay increases, 43 percent indicated that LEEP was, or probably was, an important factor in these pay increases.

However, the existence of an educational incentive program apparently influences individuals to attribute their promotions and/or pay raises to LEEP courses. (See app. II, tables B and C.) For example, 54 percent of the respondents working for organizations with an incentive plan believed their promotions were, or probably were, a result of their LEEP participation, compared with 36 percent of those working where no such program existed.

Our study did not show the extent to which criminal justice agencies consider LEEP participation when promoting personnel. Nonetheless, LEEP apparently is a motivating factor when agencies have educational incentive plans.

LEEP IMPACT ON EDUCATIONAL EXPENSES

LEEP has helped defray educational costs but has not covered all expenses. Because the costs of education vary widely--depending on the location, school, and student--we did not attempt to establish the percentage of each graduate's educational costs paid by LEEP. Rather we asked the graduates how many college courses they had taken and how many of these courses LEEP helped fund.

About 74 percent had taken 31 or more courses, and LEEP assistance had been provided for over half of the courses taken by at least 58 percent.

Sixty-nine percent of the respondents who were in a criminal justice job before entering the program had taken 31 or more courses, while 85 percent who had no previous criminal justice experience had taken 31 or more courses.

Although the question was not specifically asked, 94 of the respondents commented that they could not have obtained advanced education without LEEP assistance. About

80 percent of these respondents are currently working in criminal justice. Some of their comments were:

"Without LEEP funding I could have never made it through school."

"Without LEEP I would never have been able to go to college."

"I feel that the assistance given to me under LEEP has been significant in allowing me to continue my education in a major university. I feel without it my studies would probably have to have been discontinued intermittently to work on the outside to gain enough money to cover what I am getting under LEEP."

"Thanks to the LEEP program for providing me with funds necessary for me to complete my degree requirements."

"It gives a person the financial assistance that a family man needs to go to college."

We also received comments from some respondents that the amount of assistance they were receiving was not sufficient to meet their educational costs. However, for the most part, LEEP funds have helped defray educational costs and thus enabled students, who might not otherwise have been able, to complete courses and take jobs in the criminal justice field.

RESPONDENTS' OPINIONS OF LEEP

We asked respondents to make general comments about LEEP.

They generally had positive attitudes toward LEEP. Some respondents (16 percent), however, commented on the problems they had experienced with administrative matters and LEAA's billing system. (See ch. 4.) For example, some graduates required to pay back their loans or grants because they did not obtain employment with a criminal justice agency received incorrect statements. Others, who continued their criminal justice jobs or found such jobs and therefore did not have to repay, received statements requesting payment to LEAA.

CONCLUSIONS

Most LEEP graduates are pursuing careers in criminal justice and believe that the education they received has helped them improve in their jobs. However, many LEEP graduates who do not have criminal justice work experience have been unable to obtain jobs in the field. Therefore, criminal justice agencies apparently are not fully using LEEP's benefits.

RECOMMENDATIONS TO THE ATTORNEY GENERAL

We recommend that the Attorney General direct the Administrator, LEAA, to:

- Provide information on employment opportunities to LEEP participants and determine what factors are preventing many LEEP graduates with no criminal justice work experience from finding criminal justice employment.
- Consider how career counseling and placement services might be provided to LEEP participants to insure that criminal justice agencies will benefit from their knowledge and training.

AGENCY COMMENTS AND ACTIONS

The Department of Justice, in a letter dated May 12, 1975, advised us that it generally agreed with our recommendations regarding the need to improve criminal justice employment opportunities for LEEP graduates. (See app. I.)

The Department stated that a long-range effort is needed to provide adequate employment information to graduates. It noted that such an effort might include establishing justice manpower information exchange centers in each State. But the Department did not indicate whether it endorsed such a concept. LEAA is apparently still studying the issue.

The Department was clearer as to what LEAA will do over the short run to provide preservice students more effective job placement and provide better assurance that graduates take criminal justice jobs. Program policy changes proposed for fiscal year 1976 require institutions participating in the LEEP preservice program to, among other things, develop and sponsor a criminal justice internship or work experience as part of the program and provide placement services for preservice students.

If proposed changes are adopted and enforced, better assurance that LEEP preservice students are committed to and find work in the criminal justice field should result.

CHAPTER 3

PROBLEMS IN ADMINISTERING LEEP

LEEP has experienced the following administrative problems:

- Untimely and subjective distribution of funds to schools, resulting in inefficient use of funds and hampering the effective operation of the program at the schools.
- Deficiencies in accounting for payments for individual participants, resulting in LEAA's inability to hold participants accountable for receiving LEEP funds.
- Insufficient program monitoring, preventing LEAA from determining how well schools are administering the program.
- Absence of program evaluation, preventing LEAA from determining the program's success.

The administrative problems occurred in part because of (1) a lack of adequate direction of the program by LEAA headquarters officials and (2) insufficient staff.

LEAA began addressing these problems in 1973 and, with the help of a Joint Financial Management Improvement Program (JFMIP)^{1/} task force, has tried to resolve some of them. (See ch. 4.)

PROBLEMS IN ACCOUNTING FOR LEEP FUNDS

Because of its inability to establish and maintain an effective accounting system, LEAA at various times

- did not have accurate information on the amount of LEEP funds schools spent for LEEP and the amounts of unused LEEP funds the schools held and
- could not identify students who owed LEAA for loans or grants received because they had not met certain legal obligations to pursue or continue criminal justice careers.

^{1/}A cooperative program of GAO, the Office of Management and Budget, the Department of the Treasury, the Civil Service Commission, and the General Services Administration to improve financial management throughout the Federal Government.

These problems affected LEAA decisions on resource allocation to schools, school planning and use of LEEP funds, and student participation in the program.

As early as June 1969, officials responsible for administering LEEP recognized the need to establish an automated data processing staff and to develop procedures to support the LEEP institutional and student accounting operations. LEEP's accounting system and number of personnel were inadequate to maintain the institutional and student accounts.

In February 1970 the Director of the Office of Academic Assistance noted in a memorandum to the LEAA Administrator that the Office's Program Operations Division was not staffed sufficiently. The division, which was responsible for all LEEP accounting functions, had nine employees--two professionals, six fiscal support staff employees, and one secretary. Initially the Director had estimated that the task would require a minimum of 26 employees. He subsequently noted that about 20 additional persons, mainly low-grade fiscal support employees, would be needed by fiscal year 1971.

Because of the inadequacy of the accounting system, LEAA awarded a contractor about \$56,000 in June 1970 to design and set up a computer system to maintain LEEP institutional and student accounts. Institutional accounts primarily involved keeping records on the amounts of funds advanced to and spent by the institutions. Student accounts mainly involved keeping records on the total loan or grants provided each student and on the extent to which the student was obligated to repay.

When accepted by a school to receive assistance under LEEP, a student completes and signs a Student Application and Note, which includes biographical data; the amount of the LEEP loan (for preservice students) or grant (for inservice students); and, for inservice students, employer certifications of the student's employment. It officially specifies the student's contractual obligation to LEAA under LEEP. It also commits inservice students to remain with a criminal justice agency for 2 years following completion of any course for which they receive grant funds.

The preservice student, to be eligible for a loan, must acknowledge his intentions to enter the criminal justice field or otherwise repay LEAA the moneys received plus interest. To verify both the student's intent to enter the criminal justice system and his employability in the system, LEAA requires all preservice students--before entering the program--to obtain a letter from a criminal justice agency stating

that, if the student passes all the necessary tests and otherwise meets the qualifications for employment, the agency will consider him eligible for employment. The statement is not a commitment by the agency to employ the individual.

Loan recipients have their loans plus interest canceled at the rate of 25 percent for each year of full-time service as criminal justice employees following completion of LEEP. A LEEP loan must be repaid to LEAA when a borrower (1) ceases to be a full-time student or (2) is not employed by a law enforcement agency after he graduates. Grant recipients must repay the amount of their grant plus interest to LEAA if they do not remain with a criminal justice agency for 2 years.

Both LEEP loan and grant recipients must repay the principal amount of the loan or grant within 10 years with 7-percent per annum interest on the unpaid balance. The repayment and interest accrual periods for loans begin 6 months after the person ceases to be a full-time student. For grants, the recipient enters repayment status the first day of the calendar month after he terminates employment with a criminal justice agency. The LEEP manual states that repayment for grants and loans must not be less than \$50 per month, paid in regular quarterly installments of \$150. Students are required to submit a new Student Application and Note for each semester or quarter they request additional assistance.

The contract to improve the system to account for institutional and student funds was scheduled to terminate in November 1970. Eventually it was extended to September 30, 1971, at an additional cost to LEAA of \$118,019 and then extended again to February 29, 1972, at an additional cost of \$61,425. The total contract was for 20 months and cost about \$235,700. The extensions were necessary because neither LEAA nor the contractor had accurately estimated the time and costs involved in designing and implementing a computerized system.

But, when the contract was finally terminated in February 1972, LEAA was not prepared to operate the system--primarily because of a lack of properly trained employees.

Top LEAA management had been aware for some time that additional employees would be needed, as numerous memorandums written between October 1970 and October 1972 show. For example, an October 12, 1970, memo from the Assistant Director of the Office of Academic Assistance to the Director of the Office stated:

"* * * The main objective in writing this memorandum is to start some thinking into the need for a supplemental study by [the contractor] of the manpower requirements to implement the system they are proposing. Otherwise, we might buy the system and then not have the staff to implement it."

A December 29, 1970, memo from the Director of the Office of Academic Assistance to an LEAA Associate Administrator stated:

"This survey should be accomplished if we are to make reasonable position requests in the FY 71 supplemental. Further, to achieve maximum benefit from this system it is essential that it be adequately staffed."

A June 1972 memorandum from the Director of the Manpower Development Assistance Division to the Assistant Administrator of the Office of Criminal Justice Assistance stated:

"What has been needed--and should have been arranged far back in April--was a 'program analyst' at a GS-9 or GS-11 level to work in-house as a responsible operator. Lacking this, I predict that the [contractor's] system will not operate long after June 30, 1972."

Another memo from him to the same Assistant Administrator dated October 20, 1972, stated:

"Since July, 1972, repeatedly we have pointed out operational problems which jeopardize LEEP. We have urged that a programmer analyst be available to bring the LEEP computer system to an operational status and to maintain operations."

LEAA management, however, did not provide sufficient staff to operate the computer system. As a result, the system never functioned properly and LEAA maintained inaccurate and incomplete LEEP institutional and student financial data.

Institutional accounts

LEAA did not have adequate information on the amount of individual institutional expenditures or the amount of unspent funds on hand at institutions at the end of the fiscal years. Thus, LEAA did not have accurate financial data to use in recommending LEEP institutional awards for fiscal years 1970-72 and could not determine how well schools were managing and using LEEP funds.

LEAA's Office of Audit recognized some of these problems and issued an interim report in February 1972 recommending a reconciliation of LEEP institutional accounts for fiscal years 1969-71. In March 1972 LEAA's Office of Inspection and Review began to reconcile a discrepancy of about \$3.5 million for the years 1969-71 and accounted for all but about \$700,000. The discrepancy occurred because LEAA did not process all notes in its possession and also because many institutions had inaccurate expenditure reports or were delinquent in submitting notes to LEAA.

The Office of Audit issued its report on LEEP in October 1972, stating that LEAA's reconciliation efforts had not been completed and that the LEEP accounts probably would never be fully reconciled because LEAA had not adequately (1) maintained records of funds advanced to individual schools and (2) accounted for student LEEP notes.

In April 1973 the LEAA financial management task force was formed to reconcile LEEP institutional accounts for fiscal years 1969-73 by direct correspondence with the institutions. This effort was completed in August 1973 and, according to LEAA officials, resulted in a total reconciliation of LEEP institutional accounts for the first 5 years of the program. The task force report indicated that LEAA's records of LEEP funds disbursed, refunded, and on hand at schools agreed with records maintained at the schools.

Student note accounts

LEAA also did not have adequate information on LEEP participants, did not maintain adequate records, and could not hold individuals responsible for having received LEEP assistance. Problems arose because of such factors as (1) untimely keypunching of notes, (2) incomplete or inaccurate preparation of notes by students and institutions, (3) rigid computer program edit criteria which caused considerable delay in processing notes, and (4) lack of sufficient LEAA staff.

As a result, the first billing of LEEP students was not made until February 1971, even though some students should have been billed as early as the end of the 1969 school term. This first billing included all loan recipients LEAA could identify as having either dropped full-time status or who had failed to find jobs in the criminal justice system.

The number of student notes that could not be accounted for at LEAA headquarters gradually increased. As of March 1972, about 28,000 notes were unfiled and not in any order

which would facilitate locating an individual student's note. By August 1973 the total had reached about 250,000, an increase due in part to the yearly growth in the number of students participating in LEEP. But included in the unfiled notes for fiscal years 1969-73 were most of the approximately 20,000 student notes rejected from the LEEP computerized accounting system because of problems with the computer program.

LEAA's inability to adequately maintain participant accounts for fiscal years 1969-73 prevented LEAA from accurately determining:

- How many LEEP students were pursuing degrees, had attained degrees, or had completed their coursework.
- Which former LEEP students had not met their legal obligation to pursue or continue a criminal justice career.
- How much of a refund each student owed LEAA for a loan or grant.

LEAA had inadequate financial and administrative control over the program.

Until LEAA updates and completes information on each student and is assured that schools are notifying LEAA of changes in student status, it cannot be certain that all LEEP students who have dropped from the program or who have not continued or entered criminal justice careers have been identified and collection action has begun. In addition, the large number of unfiled notes for such a long time precluded LEAA from doing any evaluation studies on LEEP graduates.

EFFECTS OF ACCOUNTING PROBLEMS ON SCHOOLS AND STUDENTS

The accounting problems adversely affected LEAA decisions on what schools should receive funds and in what amounts. The problems also prevented LEAA from efficiently and equitably allocating funds to schools. Schools were uncertain about how much money they would receive from LEAA for LEEP students and this created administrative problems for them. Students could not be certain whether the school would receive enough funds to cover their requests for LEEP assistance.

Lack of information hampered
effectiveness of review panels

LEAA's problems in allocating LEEP funds to schools were due, in part, to the lack of information available to review panels for the first 4 years of the program. From the inception of LEEP in the second half of fiscal year 1969 until the beginning of fiscal year 1973, annual LEEP awards to participating institutions were made directly by LEAA's headquarters staff on the recommendations of a review panel of four college student financial aid officers assisted by LEAA staff members. For fiscal years 1970-72, the panel was expanded to include criminal justice educators.

The review panel, however, did not have adequate institutional financial data upon which to base funding decisions because LEAA could not accurately account for LEEP institutional funds. The panel, divided geographically into subpanels to facilitate review of institutional applications for funds, convened once a year for approximately 1 week to review applications and make recommendations to LEAA on yearly LEEP funding levels for participating institutions. The LEAA Administrator then reviewed the panel's recommendations and approved the final awards.

LEAA instituted the review panel process because of precedent established by the Office of Education of the Department of Health, Education, and Welfare, where a panel decides on student financial aid awards. Such a panel supposedly offsets potential criticism about favoritism in dispensing Federal dollars.

For the first year of LEEP funding--fiscal year 1969--the review panel members had to make such basic decisions as which schools to fund and what amount to give each school. These decisions established the baseline for all future decisions regarding institutions and amounts provided for the program.

LEAA established criteria to aid the panel members in making the basic decisions, including such factors as school location, size, and criminal justice degrees offered. However, because the panel members did not have sufficient information to adequately consider these criteria in making their decisions, selecting and funding was done subjectively.

In the succeeding years the process improved, but limited information and time prohibited panel members from fully using the established criteria in making funding decisions. For example, in fiscal year 1971, 9 individuals had to process

approximately 900 institutional applications in 3 days. They did not attempt to determine school and student needs but based funding decisions on previous allocations which, because of lack of data, had been subjective.

As a result, many schools received larger amounts of funds than they needed, which contributed to large unspent LEEP balances at numerous institutions. Other schools received less LEEP funds than students might have used. For example, the University of Maryland was forced to refuse funding to 58 new inservice applicants for the fall 1973 semester because of insufficient funds.

Other administrative problems

During fiscal year 1972, the LEAA Administrator delegated to LEAA regional administrators the authority to approve, administer, monitor, modify, extend, terminate, and evaluate LEEP grants to institutions of higher education. This authority was subject to the policy, allocation of funds, and guidelines promulgated by the LEAA Administrator.

The LEAA Administrator made the decision to delegate the major part of the responsibility for the operation of LEEP to its regional offices because he believed regional operation of LEEP would facilitate administration of the program and improve its effectiveness. This decision was in line with the LEAA Administrator's policy of granting more responsibility to the regional offices for the administration and operation of major programs. Although LEEP's headquarters staff had written guidelines, many of these guidelines were broad and allowed the regional offices to choose how to administer the program. The guidelines also changed frequently.

LEAA's numerous changes in LEEP policy have caused confusion and difficulty for schools in administering the program. Officials at several schools told us that new LEEP procedures were often initiated by LEAA before old ones could be fully implemented. School officials also said it took more time to administer LEEP than other federally assisted programs because LEEP's policy and procedures apparently changed more than those of any other Federal program at their schools. They told us this added to the frustrations, because LEEP did not reimburse the schools for their administrative expenses.

LEEP policy changes have focused on such questions as student eligibility, institutional eligibility, and courses qualifying for LEEP funding. LEEP fiscal policy changes have been primarily concerned with establishing priorities

for awarding LEEP funds. Some of these changes resulted from statute, but many originated administratively. Although some administrative policy changes were necessary due to LEEP's growth, many were the result of organizational changes and LEAA's failure to develop specific program goals and objectives.

The change which had the most detrimental effect on the schools' ability to administer LEEP was LEAA's decision to stop funding new preservice students. Schools whose enrollments consisted mainly of preservice students were forced to cut back their LEEP participation and thus reduce the eventual inflow of educated individuals into the criminal justice system. Many of the institutions in this category were those with highly developed criminal justice programs.

Soon after LEEP was regionalized in fiscal year 1973, wide divergences developed in how regional offices administered LEEP policies, the most notable example being different interpretations of the LEEP funding priority schedule. The April 1973 LEEP guideline manual set forth program priorities for LEEP funds; for example, returning inservice students were to be funded before preservice students. An LEAA internal memorandum describes how regional interpretations of the use of the priority schedule have differed and what the results of such differences have been.

"Equitable implementation of the priority schedule has been precluded, in part, by differing regional methods of determining institutional LEEP allocations. Some regions earmark available funds for their constituent states on the basis of population or other factors not directly related to the national priorities. Some regions solicit institutional award recommendations from State Planning Agencies; others delegate to the SPA the authority to determine the institutional awards. Some regions reserve a portion of the regional allocation for purposes of making award adjustments later; others reserve no funds for contingency purposes. Some regions restrict institutional awards because of the nature of the academic programs.

"That which is cause for restriction in one region may be quite different from the cause in another region. These examples, although not all-inclusive, demonstrate the lack of uniformity in award procedures. As a result, the awards announced at the beginning of the fiscal year

allowed some schools to serve all students in the first six priority groups while others had insufficient funds for the first three."

LEAA believes that regional offices should use their own discretion as much as possible in dealing with the needs that arise in their regions. In 1974 LEAA directed that the regions obtain recommendations from their State criminal justice planning agencies on how schools in a State might best benefit from LEEP. The region will make final allocations to the schools after considering the recommendations of the State criminal justice planning agencies.

The following are examples of other problems resulting from LEAA's inability to manage and implement an effective computerized institutional and student accounting system.

- Second-term fiscal year 1972 LEEP disbursements were mailed a month later than requested by some institutions.
- Two-fifths of all LEEP participating institutions received their fall 1972 LEEP disbursements after the school term had begun.
- As of October 20, 1972, 207 of 894 schools had not received any LEEP disbursement for fiscal year 1973. LEAA also had inaccurate fiscal year 1972 expenditure data for about 100 of the 687 schools that had received checks.
- Several institutions in LEAA's Chicago region had not received their first-term fiscal year 1974 LEEP disbursement as of November 15, 1973.

We visited several institutions participating in LEEP to assess the impact of LEAA's accounting and allocation problems on the institutions and their students. From these visits and information from other schools, we determined that:

- Uncertainty about yearly allocations caused serious planning problems for some schools. School administrators had difficulty each term determining how many students to fund and how much to allow each because they could not be certain of the amount and timing of LEEP disbursements to be received from LEAA. Meaningful planning by the schools was difficult because final award information was not always available on time. For example, one school did not

receive this information until 1 week after classes had begun. This school had already accepted and registered 40 new students because it anticipated the award would be consistent with its estimated increase in enrollment. Because the school felt obligated to these additional students, it was forced to use funds from other accounts in lieu of LEAA funds.

--Some schools were forced to reject new inservice applicants during fiscal year 1974 because of insufficient funds. Rejection of inservice applicants inhibits fulfillment of one of LEEP's primary objectives--to upgrade the educational level of criminal justice employees. This situation could force an individual to delay or cancel his plans for attaining higher education.

--LEAA's prohibition on funding new preservice students, instituted during fiscal year 1973 and continued through fiscal year 1974, forced many applicants to be rejected and discouraged many others from applying for LEEP funds. In addition, some schools with large preservice enrollments had to remit large portions of their fiscal year 1974 LEEP award to LEAA because they were not permitted to fund new preservice students.

LEAA's institutional accounting problems and allocation procedures contributed to the large unspent balances at the schools at the end of each year for fiscal years 1969-73. The totals shown below are based on data compiled during LEAA's reconciliation of the institutional accounts in August 1973.

<u>Fiscal year</u>	<u>Total advanced to schools</u>	<u>Total refunded</u>	<u>Cash on hand</u>	<u>Total refunded and cash on hand</u>
1969	\$ 5,658,597	\$ 457,830	\$2,801,004	\$3,258,834
1970	19,889,992	1,263,480	4,548,162	5,811,642
1971	25,887,846	779,055	1,684,339	2,463,394
1972	29,606,604	720,502	1,819,125	2,539,627
1973	36,656,031	4,028,444	1,204,456	5,232,900

The Federal Government incurred a minimum of \$169,000 in unnecessary interest costs to borrow money because of the unused funds at many schools for fiscal years 1969-73. To compute this amount, we had to use the 3-month period (June through August) of each year for which we knew the exact total of cash on hand at all institutions participating in LEEP.

We could not use 12-month periods because (1) LEAA made grant awards at different times in the various years and (2) school terms were not uniform.

Also, LEAA did not require institutions to make uniform or predetermined numbers of loans each term. Since we did not know the cash balances for all institutions at the beginning of each term, we could not calculate how much money LEAA should have recovered at various times during the years. No loans, however, could have been made after the end of the program years. Thus, each June LEAA could have recovered the amount of cash on hand and saved the Government at least the \$169,000 in interest costs.

INSUFFICIENT PROGRAM MONITORING AND EVALUATION

LEAA did not adequately monitor LEEP at participating institutions and thus could not be certain schools were effectively carrying out the program or that the program was favorably affecting criminal justice manpower needs.

LEAA did not monitor or evaluate the program adequately because it did not assign sufficient staff to the task. During fiscal years 1970 and 1971, the 8 professionals in LEAA's Office of Academic Assistance monitored about 100 schools, or about 11 percent of all participating LEEP institutions. They gave priority to schools which were experiencing problems or which had requested LEAA assistance. Generally, however, only half a day was spent at each institution. A program review guide was the primary document used by LEAA staff during visits to institutions. Using the guide, LEAA personnel prepared internal reports after the visits. The reports were based on school administrators' responses to questions on various aspects of their LEEP program operations.

At the beginning of fiscal year 1973, each LEAA regional office was given the responsibility for monitoring the institutions within its region participating in LEEP. The adequacy of the regions' monitoring varied, however, because LEAA headquarters had not given them sufficient guidance and because the regions had different numbers of employees available to do the monitoring. For example, during fiscal year 1973, the Philadelphia Regional Office visited about half the schools in its region, the Chicago Regional Office visited only about 10 percent of its schools, and the Atlanta Regional Office visited 80 percent of its LEEP schools.

The Philadelphia and Chicago Regional Offices' partial monitoring was due to insufficient staff. Since the beginning of fiscal year 1973, Chicago has had 1 person assigned sole responsibility for about 195 LEEP institutions. Philadelphia, with about 95 institutions, also had one person with a similar assignment during this time. Moreover, from May to October 1973, the Philadelphia region had no LEEP coordinator.

Regional LEEP coordinators are primarily responsible for processing institutional applications and answering institutions' inquiries. In regions such as Chicago and Philadelphia with many LEEP institutions, fulfilling these responsibilities consumed most of the LEEP coordinators' time, leaving little opportunity for monitoring institutions.

During the early stages of a new program such as LEEP, it is especially important to determine if schools are effectively discharging their responsibilities and following prescribed standards to insure accountability and efficient administration of the program.

Our visits to schools and discussions with school officials in the LEAA Chicago and Philadelphia regional office jurisdictions made apparent the results of LEAA's failure to adequately monitor the program. LEEP was being administered inconsistently. For example, institutions differed in their methods of disbursing funds to students and defining changes in student status reported to LEAA. Some institutions gave LEEP checks directly to students while others credited the students' accounts for all LEEP expenses incurred. Some schools considered a student as having withdrawn from the program if he or she did not enroll in any classes for a single semester. Other schools continued to classify a student as a LEEP participant until the student failed to enroll in any classes for several consecutive semesters. Also, financial aid officials commented on the difficulties of keeping track of the numerous changes in LEEP forms and guidelines. These inconsistencies meant that it was difficult for LEAA to properly account for students in the program and hold them accountable for repaying loans or grants if they did not meet their legal obligations regarding employment with criminal justice agencies.

LEAA's failure to adequately monitor LEEP at participating institutions for fiscal years 1970-73 prevented LEAA from:

--Insuring uniform compliance with LEEP guidelines.

--Ascertaining institutions' problems in administering LEEP.

--Assessing the overall effectiveness of LEEP at the institutions.

Because LEAA lacked information on participating LEEP students, it could not make comprehensive studies to determine if, and to what extent, LEEP students were benefiting from the program. Absence of program evaluation also prevented LEAA from determining such factors as the value of specific criminal justice course offerings, the number of preservice graduates obtaining jobs in the criminal justice system, and LEEP's success in improving the inservice student's performance and standing on the job.

Section 402(c) of the Crime Control Act of 1973 requires LEAA to evaluate criminal justice manpower needs. In early 1974 LEAA officials told us such a study was in the early planning stages. The findings in chapter 2 of this report should assist LEAA in this effort.

CHAPTER 4

LEAA EFFORTS TO IMPROVE

ITS ADMINISTRATION OF LEEP

In an October 1973 letter to the Administrator, LEAA, we pointed out certain basic deficiencies in LEAA's financial management of LEEP and recommended that LEAA act immediately to correct them. Because of increasing concern with problems in LEEP, and in response to our letter, LEAA requested JFMIP's assistance to help solve LEEP's financial problems. A JFMIP-LEAA task force was created in January 1974, and a 3-month review was begun. The major areas covered in the review were institutional accounting and note processing and billings and collections.

TASK FORCE'S FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS

The task force analyzed LEEP problems and reported its findings in April 1974. The following findings and conclusions are those relevant to matters discussed in this report.

- Problems existed in the timely awarding and disbursement of funds to the institutions.
- Improvements, including closer monitoring, were needed in the use of funds to reduce unspent balances.
- The billing and collection process needed to be improved. It lacked adequate staff, which caused numerous backlogs both in processing LEEP employment certifications and answering LEEP correspondence.
- Improvements in note processing were needed in computer programming support, document flow and processing, and personnel capabilities. The current computer system was inadequate to provide LEEP program management information to process and integrate notes into the LEEP accounting system and to handle day-to-day operations.

The JFMIP-LEAA task force recommended that LEAA:

- Design, develop, and implement a computer program for processing and integrating LEEP notes into the LEAA mainline accounting system.
- Design and document improved LEEP billing and collections systems as part of a total management system for the LEAA manpower program and mainline accounting system.

- Institute improved procedures for LEEP note processing and filing and eliminate backlogs.
- Develop a total LEAA manpower program.
- Establish the regional offices as the organizations primarily responsible for operating the LEAA manpower program.
- Prepare a directive on developing regional manpower needs assessment methodology and manpower effectiveness evaluation methodology.

LEAA staff also recommended procedures for improving allocation of and accounting for LEEP funds, program monitoring, and staffing.

IMPLEMENTATION OF TASK FORCE RECOMMENDATIONS

The task force presented LEAA with the recommendations applying to LEEP and others pertaining to the development of a total LEAA manpower program in the form of a time-phased implementation program plan. LEAA management and the JFMIP Executive Director approved the project report, including the implementation plan. Implementation of the program plan began about May 1, 1974, and was scheduled to be completed at the end of 14 months.

LEAA's Office of Planning and Management is responsible for systematically implementing the improvements. The Offices of the Comptroller, Regional Operations, the Inspector General, and Operations Support and the National Institute of Law Enforcement and Criminal Justice are to provide all required support.

Full, effective implementation of the recommendations and the addition of staff at selected LEAA regional offices should improve the administration of LEEP, especially in note processing, billing and collections, and allocating and accounting for funds disbursed to schools. Although insufficient time had elapsed for us to determine if LEAA would effectively implement the recommendations, as of November 1974 LEAA had:

- Instituted improved procedures for reducing excess balances at the schools.
- Instituted improved procedures for LEEP note processing and filing, thus eliminating backlogs.

--Developed specifications for the design of an improved LEEP billing and collections system.

For example, as of October 1974, all previously back-logged student notes had been entered into the master file and all processed notes had been filed, as had the 250,000 prior-year notes. Improved document flow procedures were implemented which eliminated a series of unnecessary steps in LEAA's note processing, thus facilitating the transfer of employees to more critical areas and further reducing the backlog of unfiled notes. A contractor edited and filed notes and thus eliminated the need to assign a large portion of LEEP personnel to do the task.

The task force also believed that improved cash flow procedures reduced the level of unspent funds at the schools. The following is JFMIP's computation of the status of the total unspent LEEP funds at the schools since the initiation of LEAA's efforts to improve its institutional accounting.

	Total funds awarded to schools for fiscal year	Total funds refunded	Total funds on hand	Total funds on hand and refunded
As of 8-31-73	\$41,294,000	\$4,278,522	\$1,227,143	\$5,505,665
After insti- tution of new procedures for fiscal year 1974	As of 2-25-74: \$42,574,000 Estimate as of 8-31-74: \$43,000,000	As of 2-28-74: \$2,928,571	-	Estimate as of 8-31-74: \$2,250,000

LEAA regional office staff members are responsible for monitoring the unspent balances of loan funds maintained at institutions and for initiating action so LEAA can recover any excess balances. To assist them, LEAA established new reporting procedures in fiscal year 1975 to provide more current and accurate information on the extent to which funds are used in accordance with institutions' estimates.

The information on these reports is to be forwarded to the appropriate LEAA regional staff so they can identify institutions which are not making loans and grants at their estimated rates and therefore maintaining excessive cash balances. Thus LEAA regional office staff are expected to take the initiative in identifying and correcting fiscal problems which might exist at participating institutions.

CONCLUSIONS

The procedures discussed above appear to be a reasonable way to control cash balances at the institutions. However, to effectively implement these procedures, LEAA regional offices will have to be sufficiently staffed.

Our review indicated that, before the regions were given additional responsibilities, LEAA did not have adequate staff in all of its regional offices to effectively administer LEEP. However, LEAA does not plan to assign additional regional office staff solely to manage LEEP. This may create problems since some regions have many more participating institutions than others and may need more employees to effectively carry out their old and new LEEP management responsibilities.

RECOMMENDATIONS TO THE ATTORNEY GENERAL

We recommend that the Attorney General direct the Administrator, LEAA, to monitor the effectiveness of LEAA's regional offices in carrying out their LEEP management responsibilities and determine whether some regions need additional staff.

AGENCY COMMENTS AND ACTIONS

The Department of Justice stated in its May 12, 1975, letter to us (see app. I) that LEAA is taking administrative actions to restructure and clarify the LEEP financial and program responsibilities of its regional office staffs. Each regional office must have, as a minimum, a manpower specialist for LEEP program administration in addition to financial management staff.

If such positions are promptly filled, progress in overcoming earlier LEEP problems should be sustained. However, it is still appropriate for LEAA to assess, on the basis of the operations of appropriate regional office staff, whether one program staff position is sufficient in each of its regional offices. For example, if the proposed new fiscal year 1976 program requirements to assure that more preservice students find employment in criminal justice jobs are adopted (see p. 17), it will be the regional office's responsibility to monitor institutions' implementation of them. It is still unclear as to whether one regional staff member can assure effective implementation of all LEEP policies at the institutions within the boundaries of his LEAA regional office. The adequacy of having one program staff position in each office can be assessed only after experiencing operations under the new program policies.

RECOMMENDATION TO THE CONGRESS

Steps to improve law enforcement education programs should be completed by the fall of 1975. Therefore, we recommend that the cognizant appropriations and legislative committees discuss the results of these improvement efforts with Department of Justice officials to determine whether appropriate corrective actions have been taken. To facilitate such a determination, the appropriate committees could request the Attorney General to review LEAA's administration of its law enforcement education programs and report to the committees by the end of fiscal year 1976.

CHAPTER 5

DELAYS IN IMPLEMENTING THE INTERNSHIP

AND EDUCATIONAL DEVELOPMENT PROGRAMS

LEAA management deficiencies also contributed to problems in administering the Internship and Educational Development Programs, including:

- Untimely distribution of funds, resulting in delays in implementing the programs and large unspent fund balances at the end of each year.
- Insufficient monitoring of the Internship Program, preventing LEAA from determining how well schools were administering it.

Because of these problems, LEAA has been slow to initiate and carry out these programs and thus implement the intent of the Congress.

INTERNSHIP PROGRAM

The 1971 amendments to the Omnibus Crime Control and Safe Streets Act established an Internship Program to enhance a student's college education by combining classroom study with practical experience gained by working for a criminal justice agency.

Although the legislation was enacted in the middle of the fiscal year, funds were not available to finance the program until the Congress passed a supplemental appropriation in May 1971--even though interns were to be available during the summer of 1971. In April 1971 LEAA publicized the program in some of the country's largest police, courts, and corrections agencies to encourage them to consider hiring interns. The first set of program guidelines were mailed in May 1971 to

- all police departments serving cities with populations of over 25,000,
- the 350 largest correctional institutions,
- 275 judges in the largest cities,
- the State criminal justice planning agencies,
- LEAA regional offices, and
- LEED participating institutions.

These guidelines explained how the program would operate and who would be eligible for participation. In July 1971, the supplemental appropriation of \$500,000 was applied to the first internship awards.

Applications for participation in the Internship Program were mailed to LEEP institutions in May 1971--about the same time guidelines were issued. Because institutions need advance notification of internship awards so that they can place students in programs with criminal justice agencies, only 52 schools applied for and were granted a total of \$119,000 during the summer of 1971. Most of these schools did not spend the full amount of their internship award and voluntarily refunded the balance to LEAA.

The LEAA regional offices were given responsibility for selecting schools and awarding funds for the Internship Program for the summer of 1972. However, processing of institutional applications was delayed due to late issuance of revised program guidelines, insufficient staff to administer the program at some of the LEAA regional offices, and LEAA's failure to promote the program at the schools. As a result, a large portion of the available funds was not used. In the summer of 1972, 68 schools representing 595 students applied for funds. In 1973 the number increased to 136 schools and 1,101 students.

Even though administration of the Internship Program improved in fiscal year 1973, large unspent balances still remained. According to an LEAA official, the primary reason for this was LEAA's continued failure to promote the program adequately and to indicate to the schools early enough what funds would be available. The following summarizes funding for the program for fiscal years 1971-74.

<u>Fiscal year</u>	<u>Funds appropriated</u>	<u>Funds spent</u>	<u>Unliquidated yearend balance</u>
1971	\$500,000	\$ -	\$500,000
1972	-	294,000	206,000
1973	500,000	331,000	375,000
1974	500,000	800,000	75,000

LEAA also did not adequately monitor the program to determine school compliance with LEAA requirements. The extent of monitoring varied among the regions, but generally little or none occurred. For example, through fiscal year 1974 the Chicago Regional Office monitored the program at only one institution and only in conjunction with LEEP monitoring visits--although from fiscal years 1972 to 1974,

CONTINUED

1 OF 2

13, 30, and 24 schools, respectively, participated in the program. The Philadelphia Regional Office monitored 1 of 12 schools in fiscal year 1973 and 1 of 13 in fiscal year 1974. Without proper monitoring, LEAA has had to rely almost exclusively on the schools and students for information on its Internship Program and, consequently, has failed to maintain adequate control over the schools' administration of the program.

EDUCATIONAL DEVELOPMENT PROGRAM

The 1971 amendments also authorized LEAA to make grants to or enter into contracts with institutions of higher education, or combinations of such institutions, to help them plan, develop, strengthen, or carry out programs or projects for developing or demonstrating improved methods of law enforcement education. Although funds had been available for this purpose since fiscal year 1971, LEAA awarded only a small portion of them for educational development before fiscal year 1974, primarily because of management indecision.

LEAA sent applications for participation in the Educational Development Program to approximately 1,000 institutions in 1971. About 300 institutions responded by submitting "concept papers." LEAA assigned one staff member and three consultants to evaluate these papers. They recommended to the LEAA Administrator that nine schools be considered for funding.

After reviewing the recommendations, the LEAA Administrator did not award funds to any schools but directed the staff to develop a new approach for determining the most efficient use of the funds.

The revised approach was called the centers of excellence concept. LEAA defined a "center of excellence" as a university or a consortium of academic institutions which offered doctoral degrees in the social sciences and was affiliated with an accredited medical school and law school. Institutions which conformed to this definition were considered for centers of excellence funding.

The centers of excellence concept was developed because LEAA believed it could best use the available Educational Development Funds by awarding the funds to a limited number of universities. This was LEAA's first attempt to define a concept which would, when implemented, fulfill the purposes of the educational development amendment. After considerable debate within LEAA regarding institutions to be funded, LEAA's Associate Administrators, who were then awaiting the appointment of a new Administrator, vetoed implementation of the centers of excellence program.

During fiscal year 1973, a new LEAA Administrator was appointed and another attempt was made to use the educational development funds by forming a consortium of schools to strengthen graduate research and doctoral programs in criminal justice. In effect, this was a new version of the centers of excellence concept. The same criteria used to select schools under the centers of excellence program was used to choose consortium members. LEAA employees made site visits to examine the criminal justice programs at 25 institutions. Each institution was given a numerical rating, which was submitted to LEAA to help in selecting institutions to participate in the consortium.

The institutions presently in the consortium are Arizona State University, Eastern Kentucky University, Michigan State University, Northeastern University, Portland State University, the University of Nebraska, and the University of Maryland. The consortium agreement provides for the exchange of faculty and graduate students among the participating schools and for the strengthening of research activities and graduate programs in criminal justice. The consortium became operational in fiscal year 1974 when the schools were awarded a total of about \$5 million. The grant period extends through fiscal year 1976.

Before fiscal year 1974, only \$5,000 of funds appropriated for educational development had been spent. The funding for fiscal years 1971-74 is shown below.

<u>Fiscal year</u>	<u>Funds appropriated</u>	<u>Funds provided to schools</u>	<u>Unliquidated yearend balance</u>
1971	\$ 250,000	\$ -	\$ 250,000
1972	1,000,000	-	1,250,000
1973	2,000,000	5,000	3,245,000
1974	a/2,000,000	2,500,000	2,329,000

a/\$416,000 was unobligated in fiscal year 1974.

CAUSES OF PROBLEMS

The causes of the problems in the Internship and Educational Development Programs were similar to those in LEEP.

For fiscal years 1969-74 one office administered the programs. Although the designation of the office changed periodically, it maintained overall program responsibility. However, it did not adequately define what it hoped to accomplish with the programs in terms of determining and satisfying the manpower and educational needs of the criminal justice system. In addition, the office underwent at least

four major staff and administrative changes between 1968 and 1973; each time, a different person was given overall responsibility for the programs.

Another basic problem has been the lack of staff. To administer all educational programs at headquarters, LEAA had designated only 3 full-time professional employees as of November 1974--a drop from 10 in February 1970. As of then 8 full-time employees were to handle the programs' financial matters with the assistance of 21 part-time workers.

These problems are very similar to those addressed by the LEAA-JFMIP task force and, if the task force's recommendations are followed, they should be corrected. Therefore, we do not believe it is necessary to make separate recommendations on steps to improve management of these programs.

CHAPTER 6

SCOPE OF REVIEW

We sent questionnaires on LEEP to 550 recent college graduates who had received LEEP assistance. Eighty-five percent of those sampled responded. (See p. 51 for details of sampling method and statistical analysis.)

To determine how effectively LEAA has administered LEEP and the Internship and Educational Development Programs, we reviewed appropriate LEAA documents and interviewed LEAA officials at LEAA headquarters and at the Philadelphia and Chicago Regional Offices. We also visited and held discussions with officials at Northern Virginia Community College, Annandale, Virginia; Catonsville Community College, Catonsville, Maryland; the University of Maryland; Virginia Commonwealth University; Southern Illinois University; and Michigan State University to determine what problems institutions were experiencing in administering LEEP and the Internship and Educational Development Programs.



UNITED STATES DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20530

May 12, 1975

Address Reply to the
Division Indicated
Refer to Initials and Number

Mr. Victor L. Lowe
Director
General Government Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Lowe:

This letter is in response to your request for comments on the draft report titled "Problems in Administering Programs to Improve Law Enforcement Education."

Generally, we agree with the report and its recommendations and share GAO's concern regarding the need to address the problems in administering programs to improve law enforcement education. We also wish to thank GAO for its excellent work. The overall validity of GAO's review and the methodological techniques used to formulate conclusions were highly sophisticated and reflected a true sense of professionalism.

Many of the problems and recommendations contained in the report are timely and will help guide both the Law Enforcement Assistance Administration (LEAA) and the Department in taking corrective actions to improve the administration and management of LEAA's Law Enforcement Education Program (LEEP). We also consider GAO's observations and comments on the problems mentioned in the report to be relatively fair and objective.

LEAA recognized most of the problems cited in the report before GAO made its review and, in many cases, LEAA had initiated corrective actions. The GAO report acknowledges that LEAA had taken steps to make improvements and that, indeed, significant elements of past problems have already been resolved. This letter comments on LEAA's most recent actions and plans for dealing with the recommendations and problems contained in the draft report.

GAO note: The numbers in brackets refer to page numbers in the final report.

[17]

On page 36 of the report, GAO recommends that LEAA:

Provide information on employment opportunities to LEEP participants and determine what factors are precluding many LEEP graduates with no criminal justice work experience from finding criminal justice employment.

Consider how career counseling and placement services might be afforded to LEEP participants to insure that criminal justice agencies will benefit from their knowledge and training.

The need to provide employment information to LEEP recipients was recognized by the LEAA-Joint Financial Management Improvement Program task force, which was established in January 1974 to help improve LEEP management and operations. The task force recommended the establishment of criminal justice manpower information exchange centers in each state and the nationwide exchange of information concerning manpower needs through regional and national information summaries. To achieve this goal, a long-range effort will be required. The congressionally mandated national manpower survey (P.L. 93-83, Section 402(c)) will identify ways of matching students with available job opportunities. As the first phase, LEAA has initiated a national manpower survey to identify ways of reducing the number of students who do not find criminal justice jobs. Survey results will be available at the end of fiscal year 1976, at which time LEAA will issue appropriate guidelines as required by the Act.

About 85 percent of the students participating in LEEP are already in the criminal justice system and are participating in the in-service portion of the program. However, in recognition of the problems encountered by preservice students in obtaining information on employment opportunities and finding criminal justice employment, LEAA has prepared policy revisions for implementation in fiscal year 1976, which prescribe new program requirements for both preservice programs and selection of preservice students. Program requirements are designed to assure that the student will (a) learn about criminal justice principles, standards, and concepts in the classroom; (b) obtain practical experience in the field; and (c) receive assistance in obtaining employment. These policy changes will require institutions participating in the LEAA preservice loan program to:

1. Offer a criminal justice degree.

2. Employ a full-time criminal justice program director.
3. Develop and sponsor internship arrangements with criminal justice agencies so students may obtain criminal justice work experience.
4. Provide placement services for criminal justice preservice students.

Under an educational development grant authorized by Section 406(e) of the Act, a consortium of seven schools is now devising model counseling services to address the needs of both criminal justice agencies and the students.

The Internship Program, authorized under Section 406(f) of the Act, provides preservice students with valuable on-the-job experience which will assist them in making career choices and increase opportunities for employment by relating conceptual education to job performance. The past level of funding at \$500,000 per year, however, has limited participation to less than 1,000 students per year.

In addition, new criteria has been developed which is designed to aid school officials in identifying and selecting preservice students with a greater degree of commitment to a criminal justice career than students have shown in the past. The criteria requires the student to be enrolled in a criminal justice degree program and to be at least a sophomore. In selecting preservice students, school officials will be expected to consider the student's demonstrated ability and familiarity with the criminal justice field. In addition, the guideline criteria will clearly set forth the requirements for counseling preservice students. Specifically, school officials must discuss with the student his potential for successful service in the criminal justice system.

[19]

On page 38 of the draft report, GAO states that:

LEAA, at various times, could not identify students who owed LEAA for loans or grants received because they had not met certain legal obligations to pursue or continue criminal justice careers.

Since the time GAO made its audit, LEAA has taken significant steps to correct the deficiencies cited in the draft report. By using improved processing techniques and

additional staff, LEAA has been able to eliminate serious backlogs in the processing and filing of LEEP notes and is now operating in a timely manner. Actions taken by LEAA include:

1. Reorganizing LEAA's Billing and Collection Division into teams with specific areas of responsibility.
2. Developing an operating procedures manual and a training manual to assist the Billing and Collection Division.
3. Developing specifications for a new computer system.
4. Modifying the current billing and collection system to enhance document processing and eliminate the correspondence backlog.
5. Dividing quarterly billings into monthly cycles to make the workload more manageable.
6. Processing and updating billing statements within 30 to 60 days of receipt.

[22]

GAO states, on page 44 of the report, that:

LEAA did not have adequate information on the amount of individual institutional expenditures, or the amount of unexpended funds on hand at institutions at the end of the fiscal year.

The use of a new LEEP grant award document has made it easier for LEAA to identify the status of funds at individual institutions participating under LEEP. Furthermore, LEAA recently began assigning grant numbers to all LEEP grant award documents. The grant numbers will be included in the main line accounting system and will be used in all subsequent fiscal years. This procedure will ensure fiscal year integrity as well as maintain the status of each grant.

[23]

On page 46 of the report, GAO states that:

LEAA also did not have adequate information on LEEP participants, did not maintain adequate records and could not hold individuals responsible for having received LEEP assistance.

LEAA has taken considerable action to correct these weaknesses since the GAO audit. Many of LEAA's problems were caused by sheer volume of documents received at one time. LEAA now has a system of scheduling and monitoring student notes to assure timely submission. The system is designed to distribute the workload more evenly which, in turn, improves the movement of the documents through the processing operation. Additional staff has also been made available to assist in this activity. In addition, a contract recently awarded for manually editing student notes has contributed significantly to the timely processing of grant award documents.

In the past, the LEAA staff attempted to correct incomplete or inaccurate student notes. Now, LEAA's accounting system will not accept improperly completed notes until they are corrected by the responsible institution. These procedures have decreased note processing time from an indefinite time period ranging from 3 months to over 1 year to an average of less than 60 days. Moreover, LEAA has improved the processing of LEEP data by working closely with its contractor in programming and using the computer. LEAA is presently working on an improvement which will ultimately reduce the total processing time for LEEP notes to less than 30 days.

[25]

GAO states, on page 48 of the draft report, that:

Problems encountered by LEAA in allocating LEEP funds to schools were due, in part, to the lack of information available to review panels for the first 4 years of the program.

In response to this problem, LEAA has initiated policy and procedural changes to bring more objectivity into the process of determining institutional allocations. The program guidelines for fiscal year 1976 state that the purpose of LEEP is to "provide financial assistance for higher education which will contribute to the development of human resources needed by the criminal justice system to reduce crime and delinquency." These guidelines also establish criteria for evaluating applications from institutions for funds.

Recently developed guidelines establishing minimum qualifications for institutions to participate in LEEP will provide evaluation criteria regarding the nature of academic

programs, qualifications of faculty, and quality of past program management. Furthermore, insofar as LEEP being defined as a manpower development program, institutional LEEP applications will be evaluated in relation to overall criminal justice manpower needs as determined in LEAA and State plans and programs.

When reviewers begin the application evaluation process for fiscal year 1976, they will have detailed information showing prior year expenditures for each school. Copies of all "Summary and Certification Sheet" forms submitted to LEAA in fiscal year 1975 will be attached to the fiscal year 1976 applications from institutions. This form shows executed student notes classified according to funding priorities and summarized by number and dollar amounts.

LEAA regional offices responsible for award determination will be provided with copies of Note Control Log sheets processed by the LEAA's Headquarters Office. These sheets verify institutional LEEP expenditures, represented by fiscal year 1975 student notes, accepted into the central accounting system.

On page [28]

On pages 54 and 55 of the report, GAO states that:

School administrators had difficulty each term determining how many students to fund and how much to allow each because they could not be certain of the amount and timing of LEEP disbursements to be received from LEAA.

During fiscal years 1974 and 1975, LEAA revised its internal procedures to ensure timely fund disbursements to institutions participating under LEEP. Currently, fund disbursements are approved and initiated by LEAA's regional offices on the basis of their assessment of each institution's (a) need for funds, (b) expenditure documents for student notes, and (c) compliance with procedures established for reconciling the institution's account for the previous fiscal year. It is now policy to delay disbursements only when the school does not follow established fiscal management procedures.

Beginning with fiscal year 1975, LEAA regional offices have been assigned responsibility for monitoring the closeout of institutional LEEP accounts at the end of each fiscal year.

[36]


On page 68 of the report, GAO recommends that LEAA:

Monitor the effectiveness of LEAA's regional offices' staff in carrying out their responsibilities to determine whether additional staffing may be necessary in some regions to effectively administer the LEEP program.

Currently, LEAA's Office of the Comptroller and Office of Regional Operations are taking administrative action to restructure and clarify the financial and program responsibilities assigned to regional office staffs who carry out LEEP management functions. Staffing guidelines for regional offices have been issued. As a minimum, the guidelines require each regional office to have a manpower specialist for LEEP administration in addition to the personnel assigned to the regional office's financial management division.

We appreciate the opportunity to comment on the draft report. Please feel free to contact us if you have any further questions.

Sincerely,



Glen E. Pommerening
Assistant Attorney General
for Administration

SAMPLING METHOD AND
STATISTICAL ANALYSIS OF LEEP QUESTIONNAIRE

We developed a questionnaire to obtain the opinions and experiences of former program participants. We obtained lists of students from school years 1972 and 1973 who had successfully completed the program of instruction (i.e., obtained a degree or certificate) at 50 randomly selected schools. These institutions geographically represented all participating schools and also included schools with both large and small LEEP programs. From these lists, 550 names were randomly selected to receive a questionnaire. Because schools eligible to provide LEEP grants include 2-year as well as 4-year colleges, the term "successfully completed" means that the student received either a certificate or an associate, a bachelor, or more advanced degree. In many instances students completed a lower level program (e.g., an associate degree) and then, with LEEP assistance, continued their education to achieve a higher degree.

Following is a breakdown of responses to our questionnaire:

	<u>Number</u>	<u>Percent</u>
In sample	550	
Questionnaires returned	465	85
No response	60	11
Address unknown	25	4

Chi-square tests of independence
and goodness of fit

Our chi-square test of independence was made to establish whether an association (dependency relationship) existed between the variables being tested and to determine the strengths of identified associations.

For example, as shown in the tables below, a higher proportion of respondents who were working in agencies which had educational reward programs attributed their pay increases to LEEP courses.

<u>Pay increases</u>	<u>Educational reward programs</u>		<u>Total</u>
	<u>Yes</u>	<u>No</u>	
Yes/probably yes	84	56	140
No/probably no	24	153	177
Total	108	209	317

The chi-square test of independence can be used to determine whether the difference in proportions is significant or is merely the result of chance variations of our sample selection.

Using a chi-square statistic and chi-square table, we determined the significance of the association between the variables tested and a confidence level which represents the probability that the association was not a product of chance related to our sample selection.

We interpreted the confidence levels with the chi-square test of independence and goodness of fit as follows.

<u>Confidence that observed association is not a product of chance</u>	<u>Definition of association</u>
95 percent or greater	Highly significant
90 to 94 percent	Significant
Less than 90 percent	Insignificant

Tests of independence:

Table A

Association Between Prior Criminal Justice
Experience and Professional Area

<u>Prior criminal justice experience</u>	<u>Professional area</u>		<u>Total</u>
	<u>Police</u>	<u>Other (note a)</u>	
Yes	256	41	297
No	<u>36</u>	<u>23</u>	<u>59</u>
Total	<u>292</u>	<u>64</u>	<u>356</u>

a/ Includes probation and parole, courts, and corrections.

Significance of association: Highly significant

Degrees of freedom: 1

Corrected chi-square value: 19.489

Confidence level: 0.99+

Phi: 0.23397

Table BAssociation Between Educational Reward Program
and Promotion

<u>Promotion</u>	<u>Educational reward program</u>		<u>Total</u>
	<u>Yes</u>	<u>No</u>	
Yes/probably yes	56	71	127
No/probably no	<u>47</u>	<u>126</u>	<u>173</u>
Total	<u>103</u>	<u>197</u>	<u>300</u>

Significance of association: Highly significant

Degrees of freedom: 1

Corrected chi-square value: 8.572

Confidence level: 0.99+

Phi: 0.16903

Table CAssociation Between Educational Reward Program
and Pay Increase

<u>Pay increase</u>	<u>Educational reward program</u>		<u>Total</u>
	<u>Yes</u>	<u>No</u>	
Yes/probably yes	84	56	140
No/probably no	<u>24</u>	<u>153</u>	<u>177</u>
Total	<u>108</u>	<u>209</u>	<u>317</u>

Significance of association: Highly significant

Degrees of freedom: 1

Corrected chi-square value: 73.003

Confidence level: 0.99+

Phi: 0.47989

Table D

Relationship Between Sex and Difficulty
in Finding Criminal Justice Jobs

<u>Sex</u>	<u>Got a job</u>	<u>Could not find a job</u>	<u>Total</u>
Male	50	24	74
Female	<u>7</u>	<u>13</u>	<u>20</u>
Total	<u>a/57</u>	<u>37</u>	<u>94</u>

Significance of association: Highly significant

Degrees of freedom: 1

Corrected chi-square value: 6.419

Confidence level: 0.9887

Phi: 0.25724

a/ Two additional respondents did not identify their sex and therefore are not included in the table.

CRIMINAL JUSTICE AND HUMAN RELATIONS AREAS

Community relations

Prevention and suppression of riots and disturbances

Preparing inmates for parole

First aid treatment

Current issues in court reform

Crowd dispersal

Preparation of records and reports

Control of contraband

Familiarity with black ghetto language and customs

Familiarity with other ethnic attitudes and customs

Recognizing and dealing with deviant behavior

Legal aspects of sex offenses

Legal aspects of arrest, escape, detainment, search, etc.

Dealing with conflicts and tensions in a neighborhood

Recognizing and dealing with evidence of drug dependency

Legal definitions of crime and participants in crime

Methods of restraint

Use and care of firearms

Ability to communicate with supervisors and coworkers

Good human relations principles

PRINCIPAL DEPARTMENT OF JUSTICE OFFICIALSRESPONSIBLE FOR ADMINISTERING ACTIVITIESDISCUSSED IN THIS REPORT

		<u>Tenure of office</u>	
		<u>From</u>	<u>To</u>
ATTORNEY GENERAL:			
Edward H. Levi		Feb. 1975	Present
William B. Saxbe		Jan. 1974	Feb. 1975
Robert H. Bork (acting)		Oct. 1973	Jan. 1974
Elliot L. Richardson		May 1973	Oct. 1973
Richard G. Kleindienst		June 1972	May 1973
Richard G. Kleindienst			
(acting)		Mar. 1972	June 1972
John N. Mitchell		Jan. 1969	Feb. 1972
ADMINISTRATOR, LAW ENFORCEMENT			
ASSISTANCE ADMINISTRATION:			
Richard W. Velde		Sept. 1974	Present
Donald E. Santarelli		Apr. 1973	Aug. 1974
Jerris Leonard		May 1971	Mar. 1973
Vacant		June 1970	May 1971
Charles H. Rogovin		Mar. 1969	June 1970

END

7 miles/more