

094269

Report On Administration Of The Program To Reduce Crime In Minnesota

B-171019

Law Enforcement Assistance Administration
Department of Justice
Governor's Commission on Crime Prevention
and Control, State of Minnesota

BY THE:

**GENERAL GOVERNMENT DIVISION
U.S. GENERAL ACCOUNTING OFFICE**

**OFFICE OF AUDIT
LAW ENFORCEMENT ASSISTANCE
ADMINISTRATION, DEPARTMENT
OF JUSTICE**

**LEGISLATIVE AUDIT COMMISSION
STATE OF MINNESOTA**

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JAN. 21, 1974



UNITED STATES GENERAL ACCOUNTING OFFICE

WASHINGTON, D.C. 20548

GENERAL GOVERNMENT
DIVISION

B-171019

The Honorable
The Attorney General

Dear Mr. Attorney General:

This report on the administration of the program to reduce crime in Minnesota discusses ways in which, we believe, the Law Enforcement Assistance Administration (LEAA) and the Governor's Commission on Crime Prevention and Control, the agency that administers the LEAA program in Minnesota, can improve their operations. The report is the result of a rather unique undertaking in that it is the product of a cooperative audit by auditors of the Legislative Audit Commission of the State of Minnesota, LEAA, and the U.S. General Accounting Office. The audit was made at the request of the chairmen of three committees of the Minnesota Senate so that the comprehensive audit capabilities of the State's audit staff would be strengthened.

The cooperative audit had several objectives, one of which was to test the audit standards, recently issued by GAO for Federal, State, and local government programs. Another objective was to issue one report that would serve the needs of the Legislative Audit Commission, LEAA, and GAO. The Legislative Audit Commission is sending this report to the Chairman of the Governor's Commission on Crime Prevention and Control, and LEAA's Office of Audit is sending it to the Administrator of LEAA.

The LEAA program was selected for audit because of the high degree of interest and participation in the program at both the Federal and State levels. It should be noted that many of the reported findings in Minnesota are similar to findings developed by GAO and LEAA during reviews in other States.

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Copies of this report are being sent to the Senate and House Committees on Appropriations, Government Operations, and the Judiciary; the Members of Congress from Minnesota; and the Director, Office of Management and Budget.

Sincerely yours,

A handwritten signature in cursive script that reads "Victor L. Lowe". The signature is written in black ink and is positioned to the right of the typed name.

Victor L. Lowe
Director

UNITED STATES GOVERNMENT

DEPARTMENT OF JUSTICE

LAW ENFORCEMENT ASSISTANCE ADMINISTRATION

Memorandum

TO : Donald E. Santarelli
Administrator

DATE:

FROM *EWR* E. William Rine
Acting Assistant Administrator
Office of Audit

SUBJECT: Audit of the Minnesota Governor's Commission
on Crime Prevention and Control

This report covers the operations of the Minnesota Governor's Commission on Crime Prevention and Control and contains recommendations for corrective action which could improve the Commission's operations.

This was a unique audit in that it is a product of a cooperative effort by auditors from the LEAA Office of Audit, the U.S. General Accounting Office, and the Legislative Audit Commission of the State of Minnesota. The audit was made at the request of the Chairmen of three Minnesota Senate Committees to strengthen the comprehensive audit capabilities of the State's audit staff. The General Accounting Office was the lead agency.

The cooperative audit had several objectives, one of which was to test the audit standards recently issued by GAO for Federal, State, and local government programs. Another objective was to issue one report that would serve the needs of the Legislative Audit Commission, LEAA, and GAO. The LEAA program was selected for audit by the State because of the high degree of interest and participation in the program at both the Federal and State levels.

Copies of this report are being sent to the Chicago Regional Office and appropriate headquarters offices so that each office may take the corrective actions on the recommendations that apply to their respective areas of responsibility.

Copies of the report are also being sent to the Senate and House Committees on Appropriations, Government Operations, and the Judiciary; the Members of Congress from Minnesota; and the Director, Office of Management and Budget, by the GAO. The State Auditor is making appropriate distribution of the report within the State government.

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Chairman, Governor's Commission
on Crime Prevention and Control

Dear Mr. Chairman:

This report on opportunities to improve the program to reduce crime in Minnesota was made jointly by the U. S. General Accounting Office (GAO); the Office of Audit, Law Enforcement Assistance Administration (LEAA); and the Minnesota Legislative Audit Commission.

Our review was made pursuant to Minn. Stat. Chapter 215 (1971).

The report contains recommendations to the LEAA made by the GAO and LEAA's Office of Audit. Your attention is called to the fact that the authority and jurisdiction of the Legislative Audit Commission is limited to an examination of the affairs of the Commission on Crime Prevention and Control. Therefore, members of our staff did not participate in the examination of policies and procedures in the national or regional LEAA offices. Your attention also is called to the recommendations made to the Commission. We will appreciate being advised of actions taken or planned on these matters.

The GAO is sending this report to the Acting Attorney General of the United States, and LEAA's Office of Audit is sending it to the Administrator of LEAA. In addition, copies of this report are being sent to the Governor, the Legislature, and others.

Sincerely,

A handwritten signature in cursive script that reads "Robert A. Whitaker".

Robert A. Whitaker
Legislative Auditor

RAW:mr

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D I G E S T

WHY THE REVIEW WAS MADE

This review was made to evaluate the administration of the Law Enforcement Assistance Administration (LEAA) program in a single State--Minnesota. LEAA channels Federal financial assistance to State and local governments to

- reduce crime, and
- improve law enforcement and the criminal justice system.

This review was not made exclusively by GAO but in cooperation with the LEAA Office of Audit and the Legislative Audit Commission, State of Minnesota. Chairmen of three committees of the Minnesota State Senate requested the review so that the State audit staff's comprehensive audit capabilities would be strengthened.

Because crime is considered essentially a local problem, the Federal Government is to support, but not supplant, local responsibilities for law enforcement in the program. Accordingly, Federal and State departments and agencies, as well as the Congress, are interested in this program.

LEAA and GAO believe that strengthening State agencies' audit capa-

bility is one way to bring improvements to Federal and State programs.

They expected this joint review would

- give them an opportunity to learn more about State government auditing operations, and
- test audit standards recently issued by GAO for Federal, State, and local government programs.

FINDINGS AND CONCLUSIONS

Many of the findings included in this report are similar to findings developed by GAO and LEAA during reviews in other States.

Program results

The results achieved in combating crime with the \$19.5 million in Federal funding provided since the start of the LEAA program in Minnesota through fiscal year 1972 could not be determined, either statewide or locally. (See ch. 2.)

Crime reduction goals in the State's comprehensive plan and in individual project proposals were defined too broadly, and data on program activity collected at statewide and local levels was too inadequate to measure progress. LEAA's ability to evaluate

the effect of programs initiated to reduce crime in Minnesota has not yet been sufficiently developed.

The Governor's Commission on Crime Prevention and Control will need to develop a process for assessing the effects of its programs and should be given Federal guidance on methods for defining goals and determining what has been achieved.

Planning achievements

The Commission's comprehensive crime control plans did not fully provide specific objectives to be achieved by State and local law enforcement agencies under projects funded with LEAA funds. The plans provided little guidance to local agencies applying for subgrants. (See ch. 3.)

A large turnover of staff and the hiring of staff inexperienced in criminal justice functions and administration made the Commission's efforts to attain a capability for statewide planning more difficult.

LEAA was unable to offer adequate technical assistance, particularly in the early phase of the program, and the Commission failed to use the services of regional planning staffs effectively.

Developing, approving, and administering subgrants

The Commission staff did not sufficiently assist local agencies in developing project applications. It received and approved applications lacking important provisions, such as descriptions of goals, provisions for coordination, and financial compliance. (See ch. 4.)

After subgrants were approved and funded, the staff did not suffi-

ciently monitor and audit subgrantee operations.

The auditors, when visiting project sites, noted various management deficiencies that the Commission staff should have detected and resolved through reviews of project applications, monitoring visits, and audits.

Financial administration

The auditors were unable to render an opinion as to the accuracy of financial reports submitted to LEAA primarily because the reports

--were prepared from uncontrolled source records,

--were classified incorrectly, and

--did not contain current or complete status of subgrantee financial activities. (See ch. 5.)

The Commission's lack of adequate financial records was a factor in its failure to use or reprogram about \$264,000 of 1970 block action grant funds within the allowed time.

The Commission's reports presented financial information by functional categories prescribed by LEAA rather than by program categories described in the State comprehensive plan. Consequently, LEAA could not determine from the reports if the Commission was following the funding pattern of the plan. Several deviations from the plans have occurred since the program began.

The Commission did not provide controls in its financial system adequate to comply with limitations on using funds required by LEAA or by law.

RECOMMENDATIONS OR SUGGESTIONS

Several recommendations and suggestions were made to the Commission and to LEAA to improve assessment of program results, the use of State comprehensive plans, administration of subgrant activities, and financial administration. These are shown beginning on pp. 11, 21, 38, and 47.)

AGENCY COMMENTS AND UNRESOLVED ISSUES

The executive director of the Governor's Commission on Crime Prevention and Control and the LEAA Chicago regional office commented on the findings and recommendations in this report. Comments pertaining to the report are included in chapters 2, 3, 4, and 5.

CHAPTER 1

INTRODUCTION

The Omnibus Crime Control and Safe Streets Act of 1968 (42 U.S.C. 3701) established the Law Enforcement Assistance Administration (LEAA) in the Department of Justice to financially assist State and local government units to reduce crime and improve the law enforcement and criminal justice systems. The act stated that crime is essentially a local problem and that the Federal Government should support, but not supplant, local responsibilities for law enforcement. The act is based on the premise that comprehensive planning, based on State and local evaluation of law enforcement problems, is an indispensable requisite for preventing and controlling crime, increasing public safety, and effectively using Federal and local funds.

Federal funds are made available to (1) encourage State and local units of government to prepare and adopt comprehensive plans on the basis of their evaluations of problems in law enforcement, (2) authorize grants to State and local units to improve and strengthen law enforcement, and (3) encourage research and development of new methods for preventing and reducing crime and detecting and apprehending criminals.

The act requires that all States desiring to participate in the program establish State planning agencies. Funds to operate these planning agencies and to develop comprehensive plans were provided under part B of the act, which allocated \$100,000 to each State and the remaining appropriated funds on the basis of the States' relative populations. At least 40 percent of the planning grants awarded to each State must be made available to local units of government, and, under the 1970 amendments to the act, planning agencies must insure that major cities and counties within a State receive funds to develop plans and coordinate functions locally. Planning grant awards are not to exceed 90 percent of the total cost of States' planning operations.

Block action grant funds, allocated primarily on the basis of the States' respective populations, are made available under part C of the act to implement the programs defined in States' approved comprehensive plans. The act

defines nine broad categories eligible for action grant program funding and stipulates matching requirements according to the programs or projects involved. At least 75 percent of the action grant funds awarded to States must be made available to local government units.

OPERATION OF PROGRAM IN MINNESOTA

Until July 1971, the Governor's Commission on Crime Prevention and Control and the Minnesota State Planning Agency jointly administered the LEAA grant program in Minnesota. But at that time, the Commission took sole responsibility. The Commission, as of January 1, 1973, was composed of 29 members having varying backgrounds who were appointed by the Governor. A Commission staff, headed by an executive director appointed by the Governor, assists the Commission in developing the State's comprehensive plans, providing technical assistance to regional advisory councils and local units of government, encouraging the development of innovative projects, providing for the fiscal administration of planning and action grants awarded, monitoring subgrants awarded by the Commission, assessing project accomplishments in relation to project goals, and auditing project costs.

Regional advisory councils have been established in each of Minnesota's seven planning regions (A through G) to assist the Commission in defining needs and problems and setting priorities for programs and projects in regional boundaries. (See p. 8.) The Governor appointed the chairman of each regional council. The councils are required to have representation from all appropriate units of government in their respective regions. Each region has a small staff to provide the Commission with the planning information requested, to provide technical assistance to potential project applicants, and to review and comment on project applications.

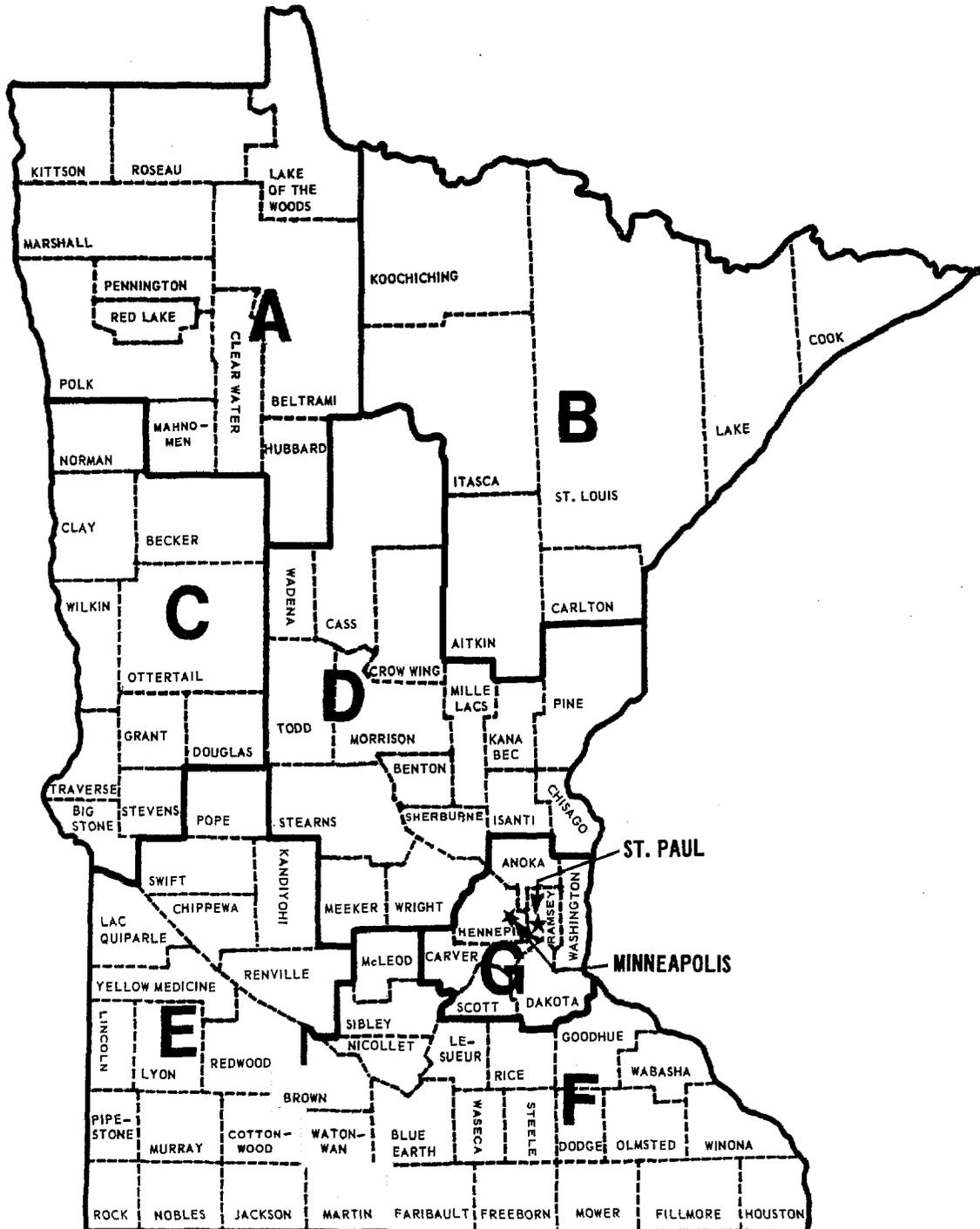
The following table summarizes, as of June 30, 1972, the authorized funding for LEAA's program and the Commission's expenditures from the beginning of the program through fiscal year 1972, as reported by the Commission.

LEAA funds

Fiscal year	Planning		Action		
	Author- ized	Expended	Author- ized	Obli- gated	Expended
1969	\$340,300	\$340,300	\$ 438,770	\$ 429,184	\$ 428,236
1970	380,000	380,000	3,302,000	3,160,606	2,782,821
1971	480,000	461,540	6,307,000	6,142,300	2,429,836
1972	645,000	309,150	7,639,000	6,229,933	146,902

Seven Planning Regions
Minnesota Criminal Justice System

SEVEN PLANNING AREAS
MINNESOTA CRIMINAL JUSTICE SYSTEM



CHAPTER 2

NEED TO ASSESS PROGRAM RESULTS

The results of the LEAA grant program in Minnesota from its inception in 1968 through fiscal year 1972 were not determinable, either in terms of the overall impact state-wide, by program categories included in the State's comprehensive plans, or in terms of the impact achieved locally from individual project action grants. Contributing to this condition is LEAA's limited development of a process for evaluating the impact of its programs on reducing crime and delinquency or any other impact on the criminal justice system. This limited development in the state of the art for evaluating LEAA programs cannot be minimized. However, LEAA has cautioned the States that acquiring funds does not insure successful or effective action; well-defined and realistic goals, careful study and program design, proper allocation of resources, and appropriate techniques are also necessary to consistently attain desired results.

We found a need to

- define, specifically or quantitatively, what can reasonably be expected to be achieved with the resources allocated;
- establish criteria for compiling data bases at the program category levels in the State's comprehensive plans and at the project levels in the action grant applications and award documents to provide a basis for determining what has been achieved with the resources spent.
- evaluate the degree that project results have been achieved in relation to statewide or program category objectives and improve evaluations made at the project level.
- establish specific requirements and provide necessary technical guidance by LEAA as to the methodology to be used in quantitatively defining objectives and measuring achievements.

The Commission's executive director acknowledged that program objectives in the 1972 State plan were not

quantified. He said, however, that quantification is suggested but not required by LEAA guidelines and that because the LEAA regional office approved the plan the Commission assumed it complied with guideline requirements.

He added that to expect a great deal of sophistication in this area is probably to expect something beyond the development of the state of the art for evaluating projects in that (1) there is little agreement about what will reduce crime and little evidence as to the amount of reduction that will result from particular approaches and (2) LEAA-funded programs account for only about 8 percent of criminal justice expenditures in the State. He stated also that, because individual projects are generally pilots and frequently small and widely dispersed geographically, it was not anticipated that project results could be accurately summarized in terms of cumulative, program level impact.

The executive director informed us that the Commission has attempted to be more specific in quantifying goals and objectives and in establishing data bases and evaluation designs for projects approved by the Commission, by using a new application form which requires this information to be submitted and by revising procedures for processing applications. He stated also that, although evaluation processes have been inadequate for many projects, the Commission has now established an in-house evaluation unit that can evaluate subgrant projects and assist subgrantees in designing evaluations for their projects.

Some activities at the LEAA headquarters level could affect any evaluation and appraisal of LEAA programs. They include (1) the possible application of the Office of Management and Budget Performance Measurement System, (2) the work of the National Advisory Commission on Standards and Goals,¹ (3) the possible implementation of recommended plans, guides, and methods for establishing goals, determining priorities, and measuring performance included in a report of the Brookings Institution to LEAA, and (4) the use of the

¹A 22-member Commission established and funded by LEAA to establish national goals, performance standards, and priorities for criminal justice planners.

crime-specific planning model proposed by LEAA's Office of Inspection and Review.

Although it may be some time before LEAA decides what method it will take to evaluate its programs, it seems that whichever method it chooses will involve quantifying objectives and establishing data bases and evaluation processes to measure accomplishments against the established objectives. In the meantime, it would be reasonable to expect that LEAA would provide interim guidance on the kinds of evaluations to be undertaken.

SUGGESTIONS TO THE COMMISSION AND LEAA

We believe that LEAA should have assisted the Commission in assessing the planning and action grant program by providing needed technical assistance to those involved in the grant program at the State and local level and by establishing mandatory requirements covering the establishment of specific or quantified objectives, related data bases, and the process by which accomplishments are to be measured against the objectives. In our opinion, without such basic methodology no reasonable measure of program performance could have been undertaken for any level of program activity.

In August 1973, we suggested that the Commission develop and implement, with LEAA assistance, a methodology for assessing program results and, in turn, provide similar assistance to subgrantees.

We suggested that LEAA establish minimum requirements covering the assessments of its grant program by State planning agencies and State and local units of government responsible for conducting projects awarded under the program. These minimum requirements should include the quantification of goals and objectives, and the establishment and maintenance of data bases and evaluation processes by which accomplishments can be measured against goals and objectives, both for the projects approved and for the program categories established in the State's comprehensive plans.

We suggested also that LEAA provide technical assistance to State planning agencies so that evaluation activities achieve the maximum usefulness and practicality. The technical assistance was to include, but not be limited to, development and issuance of a guide on evaluation methodology,

which would include sufficient illustrations for the various types of projects being undertaken by the States.

AGENCY COMMENTS AND OUR EVALUATION

Commission

After our review, the executive director of the Commission advised us of various actions it initiated to improve its capability to assess program results. It has established a project evaluation unit which will

- evaluate annually projects having grant action awards totaling at least 15 percent of the State's total for that year,
- develop and test a variety of methods for evaluating projects,
- assist potential project applicants to develop self-evaluation methods and to monitor self-evaluation progress of ongoing projects, and
- develop methods to assess the overall effect of the LEAA program in Minnesota.

The Commission's executive director cited specific accomplishments made since our review. For example, the evaluation unit evaluated provisions for evaluation and data collection in applications for 1973 action subgrants. It assisted in changing designs for some applications while, in other cases, it required designs to be improved before final approval. The unit has focused its attention on clusters of similarly related projects to gain program level evaluation and is evaluating other impacts by projects, such as cost effectiveness or improvements in social relationships.

The executive director advised us that establishing quantified goals is not as important as is often thought because reasonable goals and the expected impact cannot always be realistically determined at the outset of a project and using unrealistic goals may result in poor evaluations. The Commission staff nevertheless has begun analyses to determine the extent to which project goals are, or can be stated, in measurable terms.

The Commission recognizes clearly stated goals as indicators of a project's clarity of purpose and that quantified goals indirectly assist the evaluation process by forcing project directors to think clearly about their goals.

LEAA regional office

The LEAA Chicago regional office advised us that it has consistently pressured the Commission over the past few years to increase data and add specificity to its programs. The regional office stated that persuasion and training have been its main tools, since LEAA national guidelines allowed considerable flexibility at the State level, and LEAA is now at the stage where it can make greater demands for data, quantification of objectives, and evaluation of program success.

The regional office stated that conferences discussed evaluation methodology in May and June 1973 in Bloomington, Indiana, and that a brochure has been developed and provided to Minnesota and to other States in the region.

The regional office also stated that its State representative could provide technical assistance but that the Commission must request it. According to the office, the Commission's response to regional office advice and assistance is a key point.

Although the actions being taken at the Commission and LEAA regional office levels should improve the assessment activity, we believe the problems in measuring performance, given the existing state of the art in law enforcement activities, warrant attention at the national level.

RECOMMENDATIONS TO LEAA ADMINISTRATOR

We recommend that LEAA headquarters:

- Establish minimum requirements covering the assessments of this program by State planning agencies and State and local units of government responsible for conducting projects awarded under the program, including the quantification of goals and objectives and the establishment and maintenance of data bases and evaluation processes to measure accomplishments.

--Centrally direct the technical assistance given to State planning agencies, including development and issuance of a guide on evaluation methodology, so that evaluation activities achieve the maximum usefulness and practicality.

CHAPTER 3

NEED FOR IMPROVED COMPREHENSIVE

CRIMINAL JUSTICE PLANNING

The State's comprehensive criminal justice plans for the first 4 years of the Commission's operation did not fully serve their intended purpose. The plans were voluminous, which hampered their distribution and use; their pertinent elements were not made known to local criminal justice agencies; and, most importantly, they lacked comprehensive descriptions of goals and objectives and of other elements necessary to provide agencies with a meaningful basis to help in developing projects to attain these objectives.

The State and local agencies that we visited had made relatively little use of the State's comprehensive plans in developing their criminal justice projects. Deficiencies in the plans occurred partly because the Commission had an unusually large turnover in its staff and because staff members, although having academic backgrounds relating to planning functions, lacked experience in criminal justice activities.

LEAA regional office staff members capable in administration made monitoring visits to the Commission, but staff members who could assist in technical areas seldom did.

DEVELOPMENT OF THE STATE COMPREHENSIVE PLAN

In fiscal year 1972 the Commission staff devoted about 50 percent of its efforts to developing the State's comprehensive criminal justice plan. Of the \$413,000 of fiscal year 1972 LEAA planning funds spent by the Commission, we estimate that about \$210,000 were used in developing the plan.

Because of the large staff turnover, the Commission operated for several months early in calendar year 1971 with a skeleton planning staff. The Commission began increasing its staff in June 1971 but was immediately faced with developing the fiscal year 1972 State plan.

Because of the time constraints, the Minnesota regional advisory councils made relatively few contributions to the Commission's development of the 1972 plan. The councils' staffs were asked only to describe their problems and submit lists of project applications (in order of priority) which they anticipated local agencies would submit during 1972.

The Commission's staff advised us that it incorporated nearly all of this regional input into the 1972 plan but that much of the information requested was either not submitted or submitted in a nonuseable form. The input included in the plan, however, was described so broadly that it was not possible to specifically identify regional programs and priorities.

With the limited input by the councils' staffs and time constraints, the Commission's staff was handicapped in developing essential planning details. The plans for the action programs, a key section developed for the benefit of local units of government, were described too vaguely to be useful to local officials in discerning the Commission's emphasis on specific goals.

Given sufficient time and necessary guidance, the councils' staffs might have been able to contribute more to the 1972 plan. The staffs were beginning to research local problems for planning purposes. One region, for example, had researched the extent to which community-based group homes could be used as an alternative to placing juvenile offenders in traditional rehabilitation facilities. Another region had researched the extent and type of drug use by juveniles in rural localities.

The councils' staffs, although small, included well-qualified persons. Two regional planning directors had graduate degrees in related fields, and three had experience in law enforcement agencies. Also, members of the councils--representatives of local units of government, criminal justice agencies, and business communities--had potential for contributing to comprehensive planning.

In developing the 1973 plan, the councils' staffs were asked to develop and submit more comprehensive data, including the results of an extensive research survey of regional

needs and problems involving each functional area of the criminal justice system. The staffs, however, were allowed only 2-1/2 months to complete the survey.

Our questioning of several of the councils' staffs indicated that they resented the Commission's planning approach because they had been given relatively little opportunity to participate in developing the State's comprehensive plans for 1972 and 1973.

Lack of specific objectives

LEAA guidelines suggest that the objectives of States' comprehensive plans should be quantified when possible. The guidelines provided several examples of quantifications desired, such as new levels where new training standards were being established or new standards where caseloads of probation officers were to be reduced.

The objectives as described in Minnesota's 1972 plan were not quantified. They were described vaguely and provided little guidance to local agencies for developing applications for grants for criminal justice programs. Following are several objectives included under a category for improvement of prosecution and court activities and law reform.

"To begin a systematic process of informing police and relevant courts personnel, especially prosecutors, as to when diversion from the Criminal Justice System is appropriate and how to implement it when it is. Some outstate and some urban areas are general targets for this program.

* * * * *

"To clarify substantive criminal procedure so that its interpretation and application in the adversary system is fair and valid.

* * * * *

"To provide needy courts with certain apparatus essential to the efficient administration of justice.

* * * * *

"To upgrade the level of legal services now offered, both prosecutorial and defense, by encouraging the institution of new ways of delivering services."

The above objectives offered various activities that apparently would have been acceptable as projects; but because the objectives were vague, they did not give local agencies a specific basis on which to develop grant applications for projects. Moreover, the plan's lack of quantified goals tended to indicate to local agencies that their applications did not have to contain specific goals.

The Commission's staff told us that, because LEAA guidelines are suggestive and not compulsory and because the LEAA regional office had approved Minnesota's plan, they assumed that the plan adequately complied with essential requirements. The staff advised us that they, nevertheless, had improved the 1973 plan, having acquired experience and more ability to plan on a statewide basis.

LEAA regional officials advised us that LEAA had approved Minnesota's 1972 plan, as well as prior plans of other States, even though States had not satisfactorily described objectives.

LEAA regional officials also told us that new planning techniques for State planning agencies have been devised and are being implemented in the region. The new techniques, described as a crime-specific approach to planning, provide that objectives in States' plans be related to particular types of crimes which, through analysis, have been identified as warranting priority action. The officials stated that these techniques, when fully implemented should solve prior planning problems. They said LEAA had approved the 1973 Minnesota comprehensive plan with the understanding that the Commission would prepare and submit to LEAA within 90 days a plan to implement the crime-specific approach.

FACTORS AFFECTING PLANNING CAPABILITY

The Commission's effort to attain a capability for statewide planning for the LEAA program was difficult because of the large staff turnover in 1971 and its inability to recruit staff members experienced in criminal justice functions and administration. Also, the Commission's membership before 1972 represented few geographic areas in the State.

Lack of experience in criminal justice activities

LEAA has recognized that relatively little experience in statewide criminal justice planning existed at the start of the program in 1968 and that it was poorly equipped to provide needed technical assistance to the Commission.

The success of the program, therefore, depended largely on the development of capability during the program. In Minnesota, this development was interrupted in 1971 by the large turnover in the Commission's staff, including the executive director. The initial staff appointments had not been made under the State civil service system, and many of the professional staff resigned when a new Governor took office in January 1971. At the start of our review in May 1972, only four of these staff positions were occupied by persons appointed by the prior executive director.

Vacant positions were filled under the State civil service system. The new appointees, however, although having academic backgrounds related to planning functions, lacked experience in the criminal justice field. Our review of the staff's qualifications showed that of the 30 professionals involved with planning and programing as of July 1972, only 1 had experience of 2 years or more in a criminal justice agency.

Makeup of the Commission

During fiscal year 1972 an imbalance between urban and rural representation on the Commission affected its ability to plan equally well throughout the State. Approximately 50 percent of the State's population and 64 percent of the criminal offenses, were, respectively, located and committed in the major metropolitan area of Minneapolis and St. Paul. Although a greater representation on the 29-member Commission from the urban area was warranted, generally only 2 members represented the rural areas. In April 1972 the Governor began correcting the imbalance, and during the following 8 months, he appointed four additional members from the rural areas. Only one rural region remained unrepresented.

Under the act, the Congress recognized that crime was essentially a local problem that State and local governments had to deal with if it was to be controlled effectively. The act requires that State planning agencies represent law enforcement agencies, units of general local government, and public agencies maintaining programs to reduce and control crime. We noted that, in amending the act in 1970, the conference committee of the Congress considered but rejected provisions requiring State planning agencies to include representatives of community or citizen interests. LEAA guidelines, however, provide that planning agencies should include such representatives.

The Commission was comprised of 16 members from public agencies and 13 members representing community or citizen interests. Some dissatisfaction with the Commission's makeup existed. For example, major police agencies in the State, represented by six members on the Commission, criticized the representation afforded the law enforcement agencies. The officials on various occasions organized protesting actions contending that the Commission had not adequately recognized the overall needs and priorities of police activities.

Such dissatisfaction existed partly because LEAA guidelines did not provide a basis for determining the minimum or maximum percentage of representation to be afforded each group. Instead, the guidelines provided that LEAA evaluate each State's representation on a case-by-case basis to determine if it complied with the act. LEAA had completed its evaluation in Minnesota in July 1971. The LEAA evaluator questioned the number of members representing community or citizen interests but no action was taken because LEAA guidelines had not prescribed criteria for assessing representation.

LIMITED USE OF THE STATE'S COMPREHENSIVE PLANS

At the 30 projects we visited subgrantees made relatively little use of the State's plans in developing their project applications, either because the plans had not been available or because they lacked specific objectives which could have been used as a basis for developing projects.

Only 3 of 25 subgrantees whom we questioned indicated that the State's plans had assisted them in developing their project applications. Other subgrantees said they had obtained ideas for projects from various sources, such as their general knowledge of the LEAA grant program and the needs of the criminal justice system in their localities. Because projects were developed from sources other than the State's plans, they did not provide for a consistent, systematic approach toward solving problems or needs.

One copy of the State's comprehensive plan was distributed to each regional council's planning staff and to each council's chairman. Copies were also available to local agencies upon request, but none were requested. Even if the plans had been distributed, their use, particularly by local agencies, would have been hampered because of their volume. The 1972 plan, which consisted of 370 pages, was not organized to show regional programs and priorities. Thus, it was difficult for local agency officials to extract pertinent data.

SUGGESTIONS TO THE COMMISSION AND TO LEAA

The Minnesota comprehensive criminal justice plans did not fully serve their intended purpose of providing specific objectives for State and local law enforcement agencies under projects funded with LEAA funds because the plans either were not made available to the agencies or lacked a comprehensive description of the objectives.

Factors contributing to the plans' ineffectiveness were:

- LEAA's lack of experience in administering a program for improving the effectiveness of the criminal justice system.
- LEAA's lack of criteria for determining the minimum or maximum percentages of representation to be afforded to public agencies and community or citizen interests.
- The Commission's lack of capability to develop a comprehensive criminal justice plan because of:

1. Its previous geographical nonrepresentation.
2. The inexperience of its staff in criminal justice functions.
3. The lack of regional advisory council input to the plans from local levels.

We suggested that the Commission:

- Employ staff members who have experience in planning and in conducting criminal justice functions.
- Acquire additional planning input locally through the regional councils' planning staffs to enable them to recognize the more urgent needs of local areas.
- Provide additional time to the councils' staffs as necessary to enable them to survey or study the needs and problems of local areas.
- Provide for distributing State comprehensive plans or portions or digests of it that are pertinent to local agency officials for their implementation.

We suggested that LEAA provide criteria to assess representation on State planning agency supervisory boards and that the LEAA regional office provide technical assistance to the Commission, particularly during the early stages of development of the annual plan.

AGENCY COMMENTS AND OUR EVALUATION

Commission

The executive director told us that no evidence had been presented demonstrating the value of personnel experienced in criminal justice functions to comprehensive planning. He stated, however, that he had made a determined effort, within the framework of available resources, to staff the Commission's planning and program development section with persons who have a combination of practical, on-the-job criminal justice experience and professional planning expertise. He stated that each substantive planning team now has some person with practical experience in that particular criminal justice subsystem.

The director advised us that the staff has taken steps to support and improve local and regional planning efforts. The Commission staff and the regional staffs had jointly designed new requirements and steps for developing more adequate regional planning input, and the Commission was hopeful that these would result in more specific plans responsive to the problems and priorities of the regions. One of these steps was to allocate action funds to each region for planning purposes so each region would be able to plan for a specific amount of such funds in 1974.

The director noted that, while some program areas did lack quantified objectives, the objectives were specified to the extent possible in other sections of the plan. Projects to be approved for a particular program were included in the implementation section of the plan and long-range objectives for each program were in the multiyear section of the plan. He acknowledged that one of the problems with prior plans was that they were organized so that various sections relating to one functional category were not presented together. However, he also noted that, in the past, the Commission has not favored a totally project-specific plan, feeling that committing itself to funding particular projects ahead of time would discourage other equally worthy applicants from applying for LEAA funds.

According to the director, it takes a number of years to establish the data and planning bases needed to accurately set realistic, achievable, and quantified objectives that consider all pertinent factors. He noted that it would be foolish to expect or require quantified objectives in all areas too early in the LEAA program, because they would be unrealistic projections in many cases; he believed Minnesota was working toward the goal of quantified program objectives which related to overall program goals.

To better publicize plan contents, the director told us he intends to directly distribute plan digests from his office to local agencies and organizations and that his staff was now spending additional time visiting agencies throughout the State to bring relevant information to their attention. Also, a public information officer had been hired and given responsibility for distributing this and other material about the LEAA program in Minnesota.

LEAA regional office

The LEAA regional office agreed that staff members capable in administration made monitoring visits to the Commission, but staff members who could assist in technical areas seldom did. The office told us, however, that, except in the corrections area, no full-time technical specialists were on the staff, and under present manpower allocations, this condition will remain indefinitely.

The LEAA regional administrator agreed with our suggestion that LEAA provide technical assistance to the Commission and said the regional office State representative would attempt to do so but only if the Commission requested it.

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The Commission's actions to include personnel with criminal justice experience on the planning staff, to obtain additional regional input, and to distribute the plan should help solve some of the problems with planning.

The response of the executive director does not, however, adequately explain the lack of quantified objectives in the annual action program section of the State plan. While other sections of the plan might provide a certain amount of clarification as to the types of projects that might be considered for funding in a particular program category, the overall lack of specificity shows that the Commission is not establishing either immediate or long-term goals to be met during the funding year. In addition, establishing specific quantifiable goals for each program category would not contradict the Commission's philosophy of not committing itself to a totally project-specific plan.

While the relative newness of the LEAA program poses difficulties in accurately setting realistic, achievable, and quantifiable objectives, it is reasonable to expect a State to be able to provide even minimal approximations of what it expects to achieve in each program category for the funding committed.

We did not believe that the LEAA regional State representative should be relied on to provide technical assistance. No representative could be expected to have the expertise to

handle the vast array of technical assistance problems which could occur within a State planning agency. Rather, we believe the representatives's role should be to encourage the State to request technical assistance and to emphasize LEAA's willingness to provide it. If the lack of full-time technical expertise on the regional staff impedes such assistance, it would seem that LEAA headquarters could be called on to assist.

RECOMMENDATIONS TO LEAA ADMINISTRATOR

We recommend that LEAA headquarters provide

- criteria by which representation on State planning agency supervisory boards may be assessed and
- technical assistance to the Commission and to other State planning agencies if regional personnel cannot provide such assistance.

CHAPTER 4

IMPROVEMENTS NEEDED IN PROCESSING SUBGRANTEES'

APPLICATIONS AND IN MONITORING AND AUDITING

SUBGRANTEES' OPERATIONS

The management of subgrantees' projects could be substantially improved if the Commission's staff assumed a more influential role in developing the projects and in monitoring and auditing project operations. During our visits to 30 subgrantee projects, we noted certain conditions which indicated a need for improved management. The Commission's staff should have detected and improved these conditions either through reviews of subgrantees' applications before the start of a project or through subsequent monitoring visits to or audits of the projects.

The responsibilities of the Commission's staff, in addition to planning functions, were mainly (1) to provide technical assistance to applicants for subgrants, (2) to process applications for subgrants, (3) to monitor the progress of subgrantee operations, and (4) to audit subgrantees' compliance with rules and regulations.

Our review revealed that the conditions needing improvement could be attributable to one or more of the following factors:

1. The LEAA program was new, complex, and large, and the Commission's staff was inexperienced. These factors, coupled with a large turnover in 1971, hindered effective administration of the program. These conditions have been discussed more fully in chapter 3.
2. The Commission's staff was poorly organized for an extended period, and its duties and responsibilities were not in writing.
3. Processing of subgrant applications did not insure that applications contained provisions consistent with good management practices. Guidelines for complying with financial requirements were not always

provided to subgrantees. Consequently, many subgrantees did not properly account for expenditures or contributions, did not observe reporting requirements, and used funds for unauthorized purposes. Generally subgrantees' project operations were not monitored or audited.

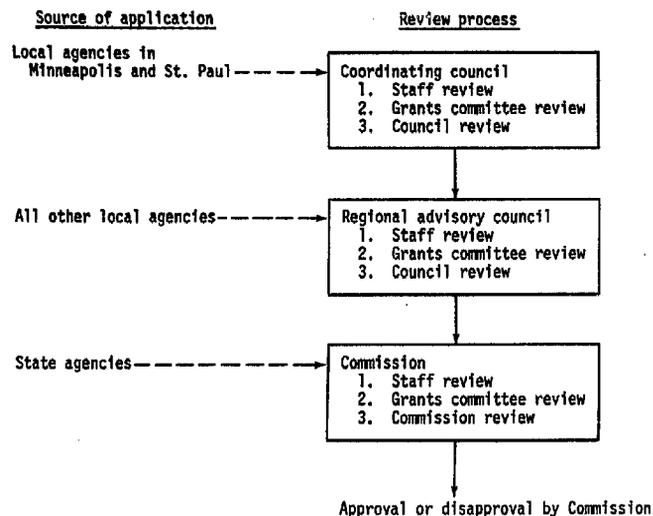
At the close of our review, the Commission had begun to reorganize its staff, assign specific responsibilities, acquire additional staff, and develop control records for monitoring visits to subgrantee projects.

NEED TO IMPROVE PROCESSING APPLICATIONS FOR SUBGRANTS

The Commission's staff is responsible for reviewing and evaluating applications for projects by State agencies and local units of government before the Commission considers them for approval. The Commission requires that a review and evaluation be made of the demonstrated need for the projects; their goals and objectives; the soundness of the methodology; the data collection provisions; and the reasonableness, adequacy, and allowability of the proposed costs.

To the extent practical, the Commission's staff was to provide applicants with technical assistance, or to coordinate assistance from other sources, in developing their applications.

Various stages of review were required of applications for subgrants as outlined below.



As shown above, nine reviews are required of applications from local agencies in St. Paul and Minneapolis, whereas six reviews are required of applications from other local agencies. This is because these two cities each have a local coordinating council that must review each application before it is submitted to the regional advisory council. All of the reviews are advisory; only the Commission can approve or disapprove an application.

Improvements needed in developing and reviewing subgrant applications

Applications for subgrants for proposed projects generally did not adequately describe projects or how they were to be operated. In some instances, the Commission's staff processed applications even though they should have been aware of the deficiencies. These deficiencies indicated a need for a more thorough review of applications.

We believe that these deficiencies could have been minimized if the Commission's staff had provided more assistance to subgrantees in developing their applications. We found that the Commission's planning staff spent less than 10 percent of its time in providing such assistance. Of 24 subgrantees we questioned, only 6 indicated that they had received assistance in developing their applications. Generally, applicants did not have any contacts with the Commission's staff until after they had submitted an application. By then, it was often too late or more difficult for the staff to offer constructive assistance. Consequently, such applications were either rejected or approved without needed alteration.

Certain deficiencies were prevalent in the applications we reviewed. As discussed in chapter 2, the goals and objectives set forth in project applications were described too vaguely to be used as a basis for measuring the progress of a project. Consequently, an adequate plan for evaluating projects, including a provision for collecting data on results, was not provided. Also, the Commission's staff had not established a procedure for evaluating the reasonableness of salary requests included in subgrant applications; the need for such a procedure seemed particularly important because grant action funds spent through September 1972 for personnel services totaled about \$3.2 million. Salaries

could not be evaluated on the basis of comparability because positions often were unique to the locality involved.

The Commission should require applicants (for whom salaries are a part of their proposed costs) to submit examples of comparable salaries of local positions that are closest to the project's education and experience requirements. Such examples would give the Commission a basis for evaluating the reasonableness of the salaries.

Other deficiencies which occurred less frequently but demonstrate a need for improvement are described below.

Similarity of services

We noted that services provided under five subgrantee projects were similar to those concurrently being provided by other sources and by one project that had been funded for 9 years by another Federal agency. In some cases, applications contained evidence of similar services. In others, the similarity would have been apparent had the planner reviewing the application made cursory inquiries. Following are examples.

<u>Service</u>	<u>Other agency or funding source providing services</u>	<u>LEAA subgrants</u>
Job and school counseling	Office of Economic Opportunity grant	\$ 34,888
Training of juvenile police officers and juvenile court judges	National Institute of Mental Health grant	43,274
Offender job surveys and placement	State Department of Corrections and private agencies	42,000
Seminar for teachers on drug education	State Department of Education	125,094
Hotline and drug education in schools	Police Department	35,000
Teaching human relations courses	Public school system	30,300

The hotline project in the above table was to provide emergency information on drugs by telephone to interested callers, but the police department and volunteer groups were already providing the service in the community. The project was also to provide drug education in community schools, but the police department was also already doing so.

The grant for training police officers and juvenile court judges had been funded from 1961 through 1970 by National Institute of Mental Health grants and for 1 year by an LEAA regional office discretionary grant. The Institute discontinued funding the training project because the training no longer could be considered innovative and because the grantee's proposal for continuation lacked adequate provision for evaluation. Although the subgrantee told us that the training curriculum had been modified on several occasions, the design of the training proposed in the renewal application was very similar to that in previous years.

Although the LEAA regional staff and the Commission's staff recognized that the proposed services had been ongoing, they nevertheless recommended continuing the project without providing for adequate evaluation.

Unnecessary equipment purchases

Budgets proposed in grant applications occasionally included provision for items that were excessive, unnecessary, or unsupported. For example, one budget included \$2,200 for purchasing equipment but did not describe the type of equipment or how it was to be used. The budgeted funds were approved by the Commission and were used to purchase recreation and office equipment. This type of equipment, however, was not needed because recreation activities had been eliminated from the approved project and the office functions were being handled by another local agency.

In another case, \$1,400 was approved for purchasing industrial shop equipment for juveniles being detained at a facility to use while awaiting trial. Extensive training necessary for juveniles to operate the equipment could not be conducted because they were only at the facility for several days.

Questionable matching contributions

Some contributions described by subgrantees to fulfill matching requirements did not actually represent contributions. For example, the matching contribution for a project to remodel a 5-year old building was the original construction cost of the building, which is contrary to Federal

regulations. Another contribution consisted of resources acquired or to be acquired under other Federal grants or programs. Funds from these programs could not be used as a match for other Federal funds.

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Suggestions to the Commission and to LEAA and agency comments pertaining to this section are included beginning on page 38.

NEED FOR INCREASED FINANCIAL
GUIDANCE, MONITORING, AND AUDITING

Inadequate financial guidance
to subgrantees

The Commission, in many instances, did not provide any guidelines to subgrantees or otherwise advise them of their responsibilities for complying with its requirements for recordkeeping, reporting, and use of grant funds. Although the Commission had developed a set of guidelines, only 6 of the 19 subgrantees we questioned said they had been given copies.

LEAA guidelines defined the type of records to be maintained for expenditures of grant funds and for fund contributions and other types of contributions, such as services, supplies, or space. These guidelines also describe the types of expenditures that are specifically classified "not allowable" by the Office of Management and Budget and LEAA.

The Commission established the requirement that subgrantees submit monthly reports of financial transactions but did not follow up to determine if the requirement was met. These reports are needed for several reasons; one reason is to assist the Commission in monitoring the progress of subgrantee operations. Also, they enable the Commission to identify funds unspent at the grant completion date so that they can be reprogramed.

As of October 1972, not all required reports had been submitted by subgrantees for 279 projects, some dating back to December 1970. The reports that were received did not provide data on unpaid obligations. Consequently the Commission has not been able to comply with the LEAA requirement for reporting such data semiannually. In the 1970 grant year, unexpended action grant funds were allowed to lapse because they had not been identified and reprogramed.

The Commission had not established guidelines for maintaining records for nonexpendable property subgrantees purchased. Proper accountability records for such purchases are necessary to (1) determine the property or portion of the cost that should be refunded to LEAA in case of termination of a subgrantee project, (2) determine that an item purchased

by a subgrantee in 1 year is not charged as a contribution in a succeeding year, and (3) preclude the duplicate purchase of like items from year to year.

The Commission had not required its subgrantees to prepare and submit inventory reports. According to the Commission's September 1972 report, \$1,030,000 had been spent for equipment.

The Commission, as required by LEAA guidelines, is primarily responsible for assuring that funds made available to local units of governments or other State agencies are used to supplement and not to supplant local or State funds. The Commission requires subgrantees to certify this but did not enforce its requirement.

Inadequate monitoring and auditing of subgrants

A relatively large number of subgrantees' projects had never been visited by the Commission's staff. The actual number of the staff's monitoring visits could not be determined, however, because the staff did not usually record them. At the 30 projects we visited, we were informed that the staff made only 5 monitoring visits. As of July 1972, the Commission's staff had audited only 17 of the 336 subgrant awards.

Monitoring activities

The Commission's onsite monitoring visits to subgrantee projects would enable it to (1) determine compliance with prescribed guidelines and requirements, (2) provide needed technical and administrative assistance to the subgrantees, and (3) evaluate the progress of projects.

The Commission had not developed an effective program for monitoring subgrantees' projects, and its plan of organization did not identify the operational units responsible for monitoring subgrantees or define their responsibilities. The Commission's staff had never visited many subgrantee projects. Monitoring generally was limited to problems or allegations that were brought to the staff's attention. Subgrantees are required to submit progress reports on each project, but reports had not been systematically reviewed and

indications of problems reported were not always given attention.

Each of the Commission's staffs for planning, administering subgrants, and auditing have monitoring responsibilities, but staffs did not know their specific responsibilities. A control record for recording the number of visits that were made to each subgrantee project had been designed but was not maintained. Also, written reports on such visits generally were not prepared. The need for detailed written policies and procedures is particularly important because of the high employee turnover.

The Commission's staff policy made the subgrant administrator and the subgrant analysts responsible for monitoring the projects' fiscal and program operations. Monitoring of the implementation and operation of technical aspects of programs would be more effective with the assistance of specialists on the Commission's planning staff.

The regional councils' responsibilities for monitoring project operations had not been defined. The director of one regional council told us that he has no such responsibility; the director of another regional council said that he is responsible for monitoring projects even though he has not been told to do so.

During our visits to project sites, we noted various problems that demonstrated a need for monitoring of project operations, particularly during the early phases of the operations. In one instance, the Commission's staff was readily able to solve an impasse that had delayed efforts of a research team's project for about 1 year. The adverse effect on the team's efforts would not have occurred if this impasse had been resolved at the outset of the project.

The Commission awarded grants totaling \$110,000 over a 2-year period to a university research team to evaluate the operation of five youth service bureaus being funded with LEAA action grant funds. To conduct its evaluation, the research team needed each of the bureaus to provide data on participants in the programs, including their names, and pledged that the names would be held confidential. One of the bureaus declined to provide the needed data because it misunderstood the team's assurance of confidentiality. The

team considered the bureau to be one of the more successfully operated ones, and wanted to include it in the study to contrast operations.

After we called this problem to the attention of the Commission's staff, one of the staff members contacted the director of the bureau and cleared up the misunderstanding. The bureau then began to provide the needed data. The research team's evaluation, however, was adversely affected due to the delay of about 1 year in obtaining the bureau's data.

At another project--a youth service bureau located in a metropolitan suburb--a goal of the approved project was to provide services to youth during hours appropriate for them. At the time of our visit, four employees and numerous volunteers operated the bureau. The bureau was open during the daytime, Tuesday through Friday, which conflicted largely with youths' school hours. The Bureau was open in the evening only on Tuesday, Thursday, and Friday. It should have provided the service primarily during evenings and weekends when the youths were not in school. The Commission's staff monitoring visits to the bureau should have disclosed the situation and enabled the staff to arrange for more suitable hours.

A main goal of a metropolitan police project--funded with \$129,000 for the first year and \$118,000 for the next year--was increasing minority participation in local law enforcement. Minority males and females between the ages of 17 and 23 were to be recruited for training as community service officers. The minimum number to be recruited was not specified. In the first year, 20 candidates were accepted for training under the civil service requirements. Only two, however, were members of minority groups, and one of these resigned after 4 weeks. Twelve other minority candidates were rejected for failing to pass civil service oral and written examinations.

In the second year, the civil service's requirements were changed to place more emphasis on a candidate's potential abilities. However, only three minority members were in training at the time of our visit.

A Commission staff member advised us that generally staff tried to visit projects when they anticipated applications for continuation of funding. In the case of this project, however, staff told us that they had not made monitoring visits. There were no indications that the Commission had taken action to improve minority participation.

At two community correction facilities being funded under action grants we visited, the unwillingness of judges of the local courts to establish control groups seriously hampered evaluation processes. Both facilities had considered randomly establishing two control groups--one to receive rehabilitation in the traditional manner and the other to receive rehabilitation under alternate techniques. Each group was to have common characteristics that would provide a basis for measuring the effectiveness of alternate rehabilitative techniques.

Project personnel told us that the idea to use control groups was abandoned because the judges considered it unreasonable to randomly select the type of institution or facility in which offenders should be placed.

If the Commission's staff had visited the facilities before approving subsequent-year grant applications, it could have discerned the inadequacy of the proposed evaluation.

Auditing activities

The Commission employed its first auditor to audit subgrant expenditures in June 1971 and increased the staff to two in March 1972 and to three in May 1972. Until July 1972 the auditors devoted most of their time to help construct the Commission's records. At that time only 17 of the 336 subgrants had been audited.

Our findings and those of the completed audits indicated a need for audits of certain aspects of all subgrantees' operations. Although the Commission's audit staff should be able to keep pace with the volume of activity, it is doubtful that it will be able to eliminate the large backlog.

The Commission did not provide many of the subgrantees with adequate guidelines or instructions on financial

recordkeeping necessary to account for funds and contributions. As a result, funds were used inconsistently with approved budgets, LEAA limitations, or other financial requirements. Following are examples of financial problems revealed during our visits to unaudited subgrantee projects.

1. Nine subgrantees were retaining funds totaling \$113,000 after subgrant periods had expired. The subgrantees told us that they believed they were entitled to use the funds. According to LEAA, however, none of the funds could be used until after a final settlement had been made with the Commission. One of the subgrantees had used the funds during a subsequent period to increase employees' pay.

At three projects, cash balances from various sources, such as tuition charges to project trainees, had been accumulated for use during subsequent periods. In other cases, cash balances were accumulated because funds advanced exceeded actual costs.

2. Our tests of 30 action and 3 planning subgrantees showed that they had incurred expenditures totaling \$26,000 for items at excessive costs or for unauthorized purposes, as follows:

Personnel services--employees worked for extended periods on unrelated activities; erroneous rates and computations were made or excess vacation allowances were provided (\$10,474).

Equipment--items purchased were not provided for in approved budget, were unnecessary to project mission, or resulted in excessive costs (\$5,877).

Meetings--expenditures at clubs, hotels, restaurants, and travel and lodging at resort areas for meetings could have easily been scheduled at less cost at other times and places (\$4,400).

Consultants--consultants were paid at rates exceeding LEAA maximum allowable rates and not approved by the Commission (\$5,216).

3. Of the total costs of \$2.2 million budgeted by the 33 subgrantees, costs of \$593,000 were questionable--\$206,000

spent from subgrant funds and \$387,000 from matching contributions. Sixteen subgrantees lacked records supporting payroll expenditures. Sixteen subgrantees lacked records to support matching contributions claimed. Two subgrantees lacked records of all expenditures for periods of up to 1 year.

SUGGESTIONS TO THE COMMISSION AND TO LEAA

The operations of subgrantee projects have frequently been inefficient or ineffective because the operating provisions in the applications either had not been fully developed or were otherwise deficient. The applications should have had a more comprehensive review to detect and correct deficiencies.

Other situations, however, should have been resolved while the projects were being developed. Project designs, which frequently have been developed exclusively by personnel of local agencies, probably could have been significantly improved had the Commission's staff provided assistance or technical skills and management techniques. The Commission's staff, which should be the principal source for providing such assistance, needed to work with the local agencies and provide assistance when necessary.

Also, because the Commission had not provided all subgrantees with written financial guidelines, many used grant funds inefficiently or for purposes unauthorized or inconsistent with project budget provisions or LEAA requirements. Subgrantees often were not given technical assistance which was necessary to effectively operate a project. The efficiency and effectiveness of subgrantees' projects could have been significantly improved if they had received assistance initially and during the operation of the projects.

We suggested that the Commission's staff:

- Provide technical and administrative assistance to local agencies in developing applications for subgrants.
- Make a comprehensive review of applications for subgrants and evaluate the reasonableness and necessity of proposed costs, including salaries.

- Evaluate effectiveness of subgrantee operations, particularly the coordination of operations with related ongoing activities.
- Provide each subgrantee with a set of written guidelines setting forth responsibilities for meeting financial requirements.
- Develop a plan for (1) systematically reducing the monitoring and auditing backlogs and (2) periodically monitoring and auditing all subgrants.
- Determine the allowability of project costs and request refunds of those costs that are determined to be unallowable.
- Return such refunds to LEAA unless they can be reprogrammed in accordance with LEAA instructions.

We suggested that the LEAA regional office evaluate the adequacy of the Commission's progress in implementing our suggestions.

AGENCY COMMENTS AND OUR EVALUATION

Commission

The executive director advised us of various actions, taken or planned, to improve the subgrant review process and to monitor and audit subgrantee operations.

- A reorganization of his staff, providing definitive responsibilities in writing, was completed. As a result, staff members have become more involved in each grant review to provide for more substantive review of technical areas. Also, the project evaluation unit is being used in the review process to assess the adequacy of the design for data collection and evaluation components of the application.
- The Commission's staff is in the process of developing a standard to evaluate the reasonableness of salary requests in application budgets.

- Forms covering application and processing procedures have been shortened and simplified.
- The Commission's grants review committee has been reorganized to use the experience of Commission members. Separate subcommittees were formed to review applications for judiciary, police, crime prevention, and juvenile justice program areas. Subcommittee assignments were based on matching expertise of Commission members.
- New procedures have been developed and included in the 1973 plan for coordinating project services with other funding sources to prevent overlapping or duplication, particularly in the area of prevention.
- Various new measures have been taken or are under consideration for improving auditing, monitoring, and administering of subgrant activities, including new and additional employee assignments, additional staff, technical assistance to subgrantees, and development and distribution of financial guidelines.

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We believe that the actions taken or planned by the Commission and its staff have potential for substantially improving the program's overall administration.

With respect to our suggestion to determine the allowability of project costs and request refunds of those costs determined to be unallowable, the executive director advised us in November 1973 that the staff has carefully studied all of the items related to the individual projects examined by the auditors and determined what followup action would have to be taken. He stated that the Commission's audit staff has begun complete audits of some projects and that at least one audit had been completed. The executive director informed us that the Commission has received refunds totaling \$20,871.13 on grant projects included in our review and that expenditures totaling \$30,445.25 had been found to be allowable.

In commenting on our findings and recommendations, the LEAA regional officials informed us that they would followup on the Commission's staffs' progress in implementing our suggestions. The LEAA regional office needs to do this punctually, particularly with respect to the allowability of project costs, so that funds improperly spent can be refunded or reallocated.

CHAPTER 5

IMPROVEMENTS NEEDED IN FINANCIAL ADMINISTRATION

We prepared the accompanying financial reports (schedules 1 and 2) by consolidating the Commission's reports for each program year of operation that were submitted to LEAA as of June 30, 1972.

Our examination was made in accordance with generally accepted auditing standards and included such tests of the accounting records and financial transactions and such other auditing procedures as we considered necessary in the circumstances except for the verification of funds held by subgrantees. The Commission did not have current and complete information on the status of these funds and it was not practicable for us to independently substantiate the amounts of the funds held by about 300 subgrantees.

We cannot render an opinion on the Commission's financial reports primarily because the reports (1) were prepared from uncontrolled source records and presented financial information by LEAA functional categories rather than by program categories established in the approved State comprehensive plans and (2) did not contain current information on status of subgrantee funds and unpaid obligations. This data was not available because the subgrantees were late in submitting their financial reports and because the prescribed reporting format did not require the submission of data on unpaid obligations. Also, the reports were not useful to LEAA for evaluating the progress of subgrantees' projects in relation to the State's comprehensive plans because they presented financial information by LEAA functional categories rather than by program categories in the approved comprehensive plans.

The Commission's lack of adequate financial controls contributed to its failure to use or to reprogram about \$264,000 of 1970 block action grant funds within the allowable time.

ACCOUNTING RECORDS NEED UPDATING

The Commission's staff told us that one of its first tasks after assuming sole responsibility for the LEAA grant program in July 1971 was to develop an adequate accounting

system. It informed us that since July 1971 the Commission's fiscal staff has devoted most of its time and efforts in an attempt to locate, construct, and reconstruct records to provide an accurate and complete accounting of the LEAA block planning and action grant funds and non-Federal contributions since the program began. The Commission's fiscal officer stated that the records system before July 1971 did not provide for expenditure control cards for each budgeted category. Therefore, data for updating was accumulated from amounts recorded in project files.

The records for fiscal years 1969 and 1970 planning grants have been reconstructed and reconciled. The records for fiscal year 1971 and 1972 planning grants had not been completely posted. The record system for these grants did not provide for an expenditure control card for each budgeted item in the planning grant for local planning units. Therefore, to determine the current status of planning funds, the Commission staff had to analyze source documents.

The Commission's accounting system for action grants was developed when the grant program was started in 1969. Because of the inadequate manner in which the system was maintained, the reports to LEAA had to be prepared from source documents.

Our review showed that reports submitted as of June 30, 1972, contained incorrect balances due to errors, omissions, or inaccurate classifications. (See sc. 2.)

NEED TO REVISE FORMAT AND IMPROVE TIMELINESS
OF SUBMISSION OF SUBGRANTEE REPORTS

The Commission's format for subgrantee reporting of financial data did not provide for reporting obligations. The Commission therefore had no information on the status of unused funds available for reprogramming. Also, the subgrantees were not submitting the reports on time.

The Commission needs to revise the format of its subgrantee reports to provide for reporting obligations and to require its subgrantees to submit reports on time. By October 1972, 279 subgrantees were late in submitting reports, some by more than 1 year. In each of the first 2 years, block planning and action grant funds were allowed to lapse because the Commission did not have data on the availability

of unused funds soon enough to reprogram them. Planning funds also lapsed during the third year. Following is a summary of the lapsed funds that should be returned to LEAA.

<u>Grant year</u>	<u>Lapsed funds</u>	
	<u>Planning</u>	<u>Action</u>
1969	\$ 5,845	\$ 11,676
1970	22,745	263,963
^a 1971	11,017	-

^aThe period of time for which 1971 action grant funds were available had not expired at the time of our review.

Each year LEAA established deadlines for obligating and spending subgrants. If the Commission had received current data on subgrantees' expenditures and obligations, it could have identified unused funds in time to reprogram them for other projects.

A substantial number of applications for funds were not approved in 1972 because of the lack of funds.

AWARDS INCONSISTENT WITH STATE PLAN
AND INCORRECTLY REPORTED TO LEAA

LEAA's use of the State comprehensive plan as a control for monitoring the award of grant funds was not effective because the awards were not classified by program categories. LEAA did not correct the deviations or require that financial reporting be consistent with program categories provided in the plan.

The LEAA guidelines provide that, for block action grants, reprogramming of funds beyond LEAA-established limitations are allowable only with prior LEAA approval.

The Commission's records did not always show whether the amount of deviations from program categories was within the limitations established by LEAA. Many deviations from the limitations occurred, and the Commission neither reported to nor sought approval of LEAA.

The Commission's records of amounts awarded generally disclosed deviations from LEAA limitations except when unused funds subgrantees returned were reawarded. The

Commission recorded transactions involving the return and reaward of funds for cash accounts but not for program categories.

We found numerous examples in the Commission's records of deviations of awards from prescribed limitations that had been made without notifying LEAA or obtaining its approval. Following are examples of such deviations.

<u>Grant year</u>	<u>Number of categories in plan</u>	<u>Categories where awards exceeded limitations</u>	
		<u>Number</u>	<u>Amount</u>
1969	12	5	\$62,774
1970	19	4	55,679
1971	21	1	80,690
1972	27	2	40,785

For 1969, LEAA's approval of deviations was sought and obtained but not until after the expenditures had been made. For 1972, the records clearly showed that awards exceeded prescribed limitations. The Commission's staff advised us that it did not seek LEAA's approval because it took for granted LEAA would approve the deviations retroactively.

The Commission's quarterly reports to LEAA did not disclose the deviations because the Commission reclassified the amounts awarded and reported the awards and expenditures on the basis of 10 LEAA functional categories instead of by program categories in the approved State plans. Thus, a comparison of awards by category to the State plan could not be made.

The Commission's staff advised us it was not aware that its reporting had to show awards by State plan program categories and that although the data was reported by LEAA functional categories, LEAA never advised the Commission that this was incorrect. However, the staff advised us that, beginning with the quarterly report as of September 30, 1972, reporting was placed on a State program category basis.

OTHER IMPROVEMENTS NEEDED
IN FINANCIAL ADMINISTRATION

Additional controls needed for observing
LEAA and statutory funding limitations

The Commission's controls to insure that grant awards were within LEAA and statutory limitations were inadequate. Thus, it did not know if limitations were met.

The act, as amended, imposed several limitations on the use of funds. Not more than one-third of action grant funds can be used for salaries of police and other regular law enforcement personnel. In addition, LEAA requires that not more than 20 percent of planning grant funds can be used to hire services of nongovernmental agencies or organizations. The Commission was unable to evaluate compliance with these limitations because the forms for subgrantees to prepare budgets and to report financial data did not provide for the necessary details.

When the funds were awarded the Commission adhered to a statutory requirement that at least 75 percent of action funds and 40 percent of planning funds be made available to local agencies. However, this requirement was not adhered to in the case of the reawards of funds subgrantees returned unused.

Questionable basis for allocating
indirect costs

Before July 1971, the Minnesota State Planning Agency charged the Commission \$88,000 for planning grant support services during fiscal years 1970 and 1971 without obtaining LEAA's approval of the cost allocation plan. The planning agency provided the services through June 30, 1971, after which the Commission provided its own administrative support. The agency's charge was based on the number of Commission employees and the dollar amount of program grants. The use of the dollar amount resulted in an inequitable charge because the dollar amount of grant funds administered, particularly action grant funds, had no reasonable relationship to the value of support services provided. Under this basis, the agency's charges to programs administering only planning grants would be relatively small compared to the Commission's charges.

During this period, the Commission administered action grants totaling \$3.7 million and planning grants of \$0.7 million. If the overhead charged had been based on the number of employees and only planning grant funds, the total charge to the Commission would have been reduced by about one-third.

LEAA guidelines provide that such indirect expenses are chargeable only at rates approved by other Federal agencies or when approved in advance by LEAA. Neither approval had been sought.

SUGGESTIONS TO THE COMMISSION AND TO LEAA

The Commission needed to improve its financial management system to provide accurate financial data as required by LEAA and to enable effective use of funds available for reprogramming. Among the improvements needed were maintaining current accounting records, strengthening controls over subgrantees' reporting on financial activities, and establishing controls to meet statutory and LEAA financial limitations. These improvements were needed to satisfy LEAA reporting requirements and to provide appropriate controls over financial limitations.

Many of the deficiencies in the Commission's financial management system could have been identified by an LEAA regional office analysis of the Commission's quarterly reports. Because LEAA failed to question deficiencies, the Commission thought they were unimportant and permissible.

To comply with financial requirements and reporting responsibilities and to provide for effective use of block planning and action funds we suggested that the Commission:

- Establish controls for identifying the obligation and expenditure of block action funds by program categories as contained in the approved State comprehensive plan and obtain LEAA's prior approval of deviations that may occur.
- Establish controls for promptly identifying those action funds which are not spent so that, before the funds lapse, the Commission can reprogram the funds or to return them to LEAA.

- Develop a subgrantee reporting system to promptly obtain financial data necessary for fund management.
- Submit for LEAA's evaluation an outline of circumstances relating to grant funds which were used for purposes other than those in the approved State plan.

We suggested that the LEAA regional office:

- Establish a systematic analytical monitoring function over the Commission's activities and follow up on noncompliances with prescribed requirements or administrative weaknesses until they are resolved.
- Evaluate circumstances relating to subgrantees' use of grant funds for purposes other than those in the approved State plan or for periods beyond statutory or LEAA time limitations and obtain the necessary refunds if the deviations are unwarranted.
- Review the Minnesota State Planning Agency overhead allocation plan for fiscal years 1970 and 1971 to determine the appropriate allowable charges and obtain refunds of excess charges.

AGENCY COMMENTS AND OUR EVALUATION

The executive director of the Commission advised us of several actions taken after our review to improve financial administration.

A new accounting system has been developed from existing records, which, in the executive director's opinion, is capable of meeting all current LEAA reporting requirements. The new system provides for control balances on subgrant awards, including payments to and refunds from subgrantees by State program categories. Reporting to LEAA has been revised to conform to State program categories.

Subgrantees are now required to report obligated, as well as unexpended fund balances, but the problem of submitting such reports on time had not been resolved. The Commission's staff is trying to reduce the backlog. As one means to expedite reporting, payments of grant awards are being suspended for subgrantees having reporting delinquencies.

The executive director referred to the schedule of lapsed planning and action grant funds and provided reasons why he believed LEAA should not request a refund. This matter must be resolved with the LEAA regional officials who told us in September 1973 they were looking into the situation. In January 1973 regional officials had also told us that they would look into the matters we had brought to their attention. We believe LEAA needs to act aggressively to resolve the matters discussed in this chapter, including a determination as to the appropriateness of the overhead allocation plan for fiscal years 1970 and 1971.

RECOMMENDATIONS TO LEAA ADMINISTRATOR

Accordingly, we recommend that the LEAA regional office:

- Establish a systematic analytical monitoring function over the Commission's activities and follow up on non-compliances with prescribed requirements or administrative weaknesses until they are resolved.
- Evaluate circumstances relating to the subgrantee's use of grant funds for purposes other than those in the approved State comprehensive plan or for periods beyond statutory or LEAA time limitations and obtain the necessary refunds if deviations are unwarranted.

CHAPTER 6

SCOPE OF REVIEW

Our review was directed primarily toward evaluating the administration of the LEAA program in Minnesota through June 30, 1972. We made this review in accordance with standards established by GAO in 1972--"Standards For Audit of Governmental Organizations, Programs, Activities, and Functions."

At the LEAA region V office in Chicago we examined policies and procedures for administering the program and discussed the history of program operations in Minnesota with LEAA officials. We also reviewed pertinent records, reports, and correspondence.

The principal phase of our review was at the office of the Minnesota Governor's Commission on Crime Prevention and Control in St. Paul. We reviewed the Commission's policies and procedures and discussed operating aspects of the program with the executive director and his staff. We also examined pertinent records of the Commission's staff and its subgrantees

We visited the offices of four of the seven Minnesota regional planning councils: Region C, in Moorhead and Morris; Region D, in Colleeville; Region F, in Mankato; and Region G, in St. Paul. In addition, we visited offices of Region G's coordinating councils in Minneapolis and St. Paul. We discussed program operations with directors of each of the offices and examined various records. We also visited and reviewed operations of 30 subgrantees in the four regions.

We attended meetings held by the Commission and observed proceedings being conducted and also met with and discussed program aspects with two Commission members. To obtain similar insight of proceedings conducted by regional advisory council members, we prepared and mailed a questionnaire of various program aspects to the 172 council members. We met with and discussed the program with State and local officials of criminal justice agencies, including police, correction, and court agencies in 10 cities and communities in the State.

The LEAA program was selected for review because of the high degree of interest and participation in the program at both the Federal and State levels. It should be noted that many of the findings in Minnesota are similar to findings developed by GAO and LEAA during reviews in other States.

STATUS OF LEAA PLANNING GRANTS REPORTED BY
 THE MINNESOTA GOVERNOR'S COMMISSION
 ON CRIME PREVENTION AND CONTROL (note a)

JUNE 30 1972

TOTAL FUNDS AVAILABLE FOR PLANNING:

LEAA grants	\$645,000
State matching contribution	50,000
Other Federal grants	67,000
Local agencies matching contributions	<u>34,722</u>
Total resources	<u>\$796,722</u>

EXPENDITURES:

	<u>Budgeted</u>	<u>Expenditures</u>
Personnel	\$327,830	\$317,086
Consultant services	10,000	3,390
Travel	15,000	17,340
Other	75,000	73,256
Regional planning agencies	312,500	112,642
Local matching contributions	<u>34,722</u>	<u>12,639</u>
Total operations	<u>775,052</u>	<u>\$536,353</u>
Balance to be carried forward to next fiscal year	<u>21,670</u>	
Total	<u>\$796,722</u>	

STATUS OF PRIOR-YEAR
 PLANNING GRANTS
 AND MATCHING CONTRIBUTIONS:

	<u>Federal award</u>	<u>Expenditures</u>	<u>Expenditures of matching contribution</u>	
			<u>State</u>	<u>Region</u>
1970	\$380,000	^b \$380,000	\$42,222	\$ -
1971	480,000	^b 461,540	65,861	8,846

^aThe Commission did not obtain from its subgrantees the amount of unpaid obligations as of June 30, 1972, and consequently did not report such amounts to LEAA as LEAA financial guidelines required.

^bExpenditures for 1970 and 1971 include amounts awarded to subgrantees of \$22,745 and \$29,439, respectively, that were unobligated before the last date allowable and are subject to be returned to LEAA. (See p. 44.)

SCHEDULE 2

STATUS OF LEAA ACTION GRANTS REPORTED BY
THE MINNESOTA GOVERNOR'S COMMISSION
ON CRIME PREVENTION AND CONTROL (note a)

JUNE 30, 1972

	<u>1969</u>	<u>1970</u>	<u>1971</u>	<u>1972</u>
TOTAL MINNESOTA ACTION GRANT	\$438,770	\$3,302,000	\$6,307,000	\$7,639,000
SUBGRANT AWARDS:				
Upgrading law enforcement	44,675	^b 785,104	605,279	327,300
Crime prevention	2,611	271,598	413,638	556,354
Juvenile delinquency prevention and control	33,400	411,889	1,026,664	^c 934,196
Crime detection and apprehension improvement	19,692	^d 188,292	^e 1,764,896	^f 1,886,466
Prosecution and court activities improvement and law reform	46,005	194,484	^g 206,920	^h 339,020
Increasing correction and rehabilitation effectiveness	89,740	ⁱ 481,520	^j 1,149,928	^k 1,528,872
Reducing organized crime	6,754	60,483	48,802	-
Riot and civil disorder prevention	67,449	48,677	-	-
Community relations	^l 98,292	288,763	156,354	172,429
Research and development	<u>19,966</u>	^m 429,796	ⁿ 769,819	^o 485,296
Total awards	<u>P429,184</u>	^q 3,160,606	^r 6,142,300	^s 6,229,933
PAYMENTS OF AWARDS TO SUBGRANTEES	^t 428,236	^u 2,782,821	^v 2,429,836	146,902

^aThe Commission did not obtain from its subgrantees the amounts of unpaid obligations as of June 30, 1972, and consequently did not report such data to LEAA as LEAA financial guidelines required.

^bShould be \$775,869--returned funds of \$14,800 were not eliminated and new awards of \$5,565 were not included.

^cShould be \$954,079--award of \$30,000 not included and error of \$10,117 not corrected.

^dShould be \$186,682--returned funds of \$1,610 were not eliminated.

^eShould be \$1,889,896--awards of \$125,000 of 1971 funds were incorrectly reported as 1970 funds.

^fShould be \$1,761,366--award of \$125,000 of 1971 funds incorrectly reported as 1970 funds and error of \$100 corrected.

^gShould be \$203,240--award not approved until after June 30, 1972, of \$3,680 was not eliminated.

^hShould be \$351,520--award of \$12,500 not included.

ⁱShould be \$474,520--awards of \$7,000 of 1971 funds incorrectly reported as 1970 funds.

^jShould be \$1,156,928--award of \$7,000 of 1971 funds incorrectly reported as 1970 funds.

^kShould be \$1,426,583--award of \$102,289 included twice.

^lShould be \$96,203--returned funds of \$1,142 and expired awards of \$947 were not eliminated.

^mShould be \$428,987--returned funds of \$8,210 were not eliminated and awards of \$7,401 were not included.

ⁿShould be \$755,256--award not approved until after June 30, 1972, of \$14,563 was not eliminated.

^oShould be \$466,083--award of \$19,483 included twice and clerical error of \$270 not corrected.

^pShould be \$427,095.

^qShould be \$3,141,952.

^rShould be \$6,256,057.

^sShould be \$6,015,714.

^tShould be \$427,094--returned funds of \$1,142 not recorded.

^uShould be \$2,764,921--returned funds of \$17,900 not recorded.

^vShould be \$2,429,236--error of \$600 not corrected.

PRINCIPAL OFFICIALS OF
THE DEPARTMENT OF JUSTICE AND THE STATE OF MINNESOTA
RESPONSIBLE FOR ADMINISTERING ACTIVITIES
DISCUSSED IN THIS REPORT

	Tenure of office	
	From	To
<u>DEPARTMENT OF JUSTICE</u>		
ATTORNEY GENERAL:		
William B. Saxbe	Jan. 1974	Present
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
Ramsey Clark	Mar. 1967	Jan. 1969
ADMINISTRATOR, LAW ENFORCEMENT ASSISTANCE ADMINISTRATION:		
Donald E. Santarelli	Apr. 1973	Present
Jerris Leonard	May 1971	Mar. 1973
Vacant	June 1970	May 1971
Charles H. Rogovin	Mar. 1969	June 1970
Patrick V. Murphy (acting)	Oct. 1968	Mar. 1969
<u>STATE OF MINNESOTA</u>		
GOVERNOR:		
Wendell R. Anderson	Jan. 1971	Present
Harold LeVander	Jan. 1967	Jan. 1971
CHAIRMAN, GOVERNOR'S COMMISSION ON CRIME PREVENTION AND CONTROL:		
Leonard Keyes	June 1973	Present
Robert J. Sheran	Mar. 1971	June 1973
Vacant	Dec. 1970	Mar. 1971
Douglas M. Head	June 1968	Dec. 1970

APPENDIX

<u>Tenure of office</u>	
<u>From</u>	<u>To</u>

STATE OF MINNESOTA (continued)

EXECUTIVE DIRECTOR, GOVERNOR'S
COMMISSION ON CRIME PREVENTION
AND CONTROL:

Robert E. Crew, Jr.	May 1971	Present
Vacant	Feb. 1971	May 1971
Emery Barrette	Dec. 1968	Feb. 1971

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