July 24, 2009

The Honorable Robert C. Scott
Chairman
Subcommittee on Crime, Terrorism, and Homeland Security
Committee on the Judiciary
House of Representatives

Subject: Juvenile Justice: Technical Assistance and Better Defined Evaluation Plans Will Help to Improve Girls’ Delinquency Programs

Dear Mr. Chairman:

Girls’ delinquency has attracted the attention of federal, state, and local policymakers for more than a decade as girls have increasingly become involved in the juvenile justice system. For example, from 1995 through 2005, delinquency caseloads for girls in juvenile justice courts nationwide increased 15 percent while boys’ caseloads decreased by 12 percent. Also, from 1995 through 2005, the number of girls’ cases nationwide involving detention increased 49 percent compared to a 7 percent increase for boys. More recently, in 2007, 29 percent of juvenile arrests—about 641,000 arrests—involving girls, who accounted for 17 percent of juvenile violent crime arrests and 35 percent of juvenile property crime arrests. Further, in a 2007 survey of states conducted by the Federal Advisory Committee on Juvenile Justice, 22 states listed girls’ delinquency as an issue affecting their states’ juvenile justice systems. State justice officials responding to the survey noted that juvenile female offenses have increased sharply and also noted that juvenile female offenders generally had more serious and wide-ranging service needs than juvenile male offenders, including treatment for substance abuse and mental health conditions.


3The Federal Advisory Committee on Juvenile Justice is an advisory body established by the Juvenile Justice and Delinquency Prevention Act of 1974, as amended, to advise the President and Congress on state perspectives regarding the operation of the Office of Juvenile Justice and Delinquency Prevention and on federal legislation pertaining to juvenile justice and delinquency prevention, to advise the Administrator of the Office of Juvenile Justice and Delinquency Prevention, and to review federal policies regarding juvenile justice and delinquency prevention. 42 U.S.C. § 5633(f). The Federal Advisory Committee on Juvenile Justice comprises appointed representatives from each of the 50 states, the District of Columbia, and the 5 U.S. territories.
The Office of Juvenile Justice and Delinquency Prevention (OJJDP) is the Department of Justice (DOJ) office charged with providing national leadership, coordination, and resources to prevent and respond to juvenile delinquency and victimization. OJJDP supports states and communities in their efforts to develop and implement effective programs to, among other things, prevent delinquency and intervene after a juvenile has offended. For example, from fiscal years 2007 through 2009, Congress provided OJJDP almost $1.1 billion for grants to states, localities, and organizations for a variety of juvenile justice programs. In support of this mission, the office also funds research and program evaluations related to a variety of juvenile justice issues, including girls’ delinquency.

As programs have been developed at the state and local levels in recent years that specifically target preventing girls’ delinquency or intervening after girls have become involved in the juvenile justice system, it is important that agencies providing grants and practitioners operating the programs have information about which of these programs are effective. In this way, agencies can help to ensure that limited federal, state, and local funds are well spent. In general, effectiveness is determined through program evaluations, which are systematic studies conducted to assess how well a program is working—that is, whether a program produced its intended effects. To help ensure that grant funds are being used effectively, you asked us to review OJJDP’s efforts related to studying and promoting effective girls’ delinquency programs. This report addresses the following questions:

1. What efforts, if any, has OJJDP made to assess the effectiveness of girls’ delinquency programs?
2. To what extent are OJJDP’s efforts to assess girls’ delinquency programs consistent with generally accepted social science standards and the internal control standard to communicate with external stakeholders?
3. What are the findings from OJJDP’s efforts to assess the effectiveness of girls’ delinquency programs, and how, if at all, does OJJDP plan to address the findings from these efforts?

To identify OJJDP’s efforts to assess the effectiveness of girls’ delinquency programs, we analyzed relevant laws related to the office’s role in supporting research and evaluations on delinquency programs. We also analyzed OJJDP budget data for fiscal years 2007 through 2009. We chose these years because they provide the most recent overview of the funding the office has had available to support its evaluation activities. We examined reports from research organizations and academic journal articles on girls’ delinquency issues. In our review, we focused on OJJDP’s efforts related to programs that are specifically designed for girls, not programs designed for both girls and boys. To identify OJJDP’s efforts, we reviewed a list of its grants to fund studies of girls’ delinquency programs from 1998 to 2008. We chose this time frame, the past 10 years from the start of our work, because it provided us with an overview of OJJDP’s efforts related to assessing girls’ delinquency programs. We also analyzed documentation about OJJDP’s establishment of a study group on girls’ delinquency issues, including the program.
announcement and cooperative agreement. We interviewed OJJDP officials, including the research coordinator who managed the study group project, about the office’s role in overseeing the group’s research. We also interviewed the current and former principal investigators of the study group project regarding the formation of the group, its activities, and its methodologies. To gather information on OJJDP’s efforts, we conducted interviews with 18 girls’ delinquency subject matter experts, that is, researchers and practitioners. We selected these experts based on their knowledge and experience with girls’ delinquency issues, which we determined through our review of the literature and from suggestions of experts to interview from study group members and OJJDP. These 18 experts included 11 of the 15 study group members and 7 experts who were not members of the group. While their comments cannot be generalized to all girls’ delinquency experts, we nonetheless believe that their views gave us useful insights on issues related to girls’ delinquency and OJJDP’s efforts to assess girls’ programs.

To determine the extent to which OJJDP’s efforts to assess girls’ delinquency programs were consistent with generally accepted social science standards, we reviewed the criteria the study group used to assess studies of girls’ delinquency programs and whether the group’s application of those criteria was consistent with standards for evaluation research. To determine the extent to which these OJJDP efforts were consistent with the internal control standard to communicate with external stakeholders, we compared the office’s efforts with criteria in Standards for Internal Control in the Federal Government, specifically that agency management should ensure that there are adequate means of obtaining information from and communicating with external stakeholders who may have a significant impact on the agency achieving its goals. We reviewed documentation about the composition of the study group and the criteria used to select the group members, such as their relevant fields of expertise, knowledge, and experience with girls’ issues. We also examined the study group’s external communications efforts, including its Web site, findings bulletins, conference

Cooperative agreements, rather than grant awards, can be used by federal agencies when substantial involvement is expected between the agency and the recipient when carrying out the activities described in the program announcement.

GAO defines an expert as a person who is recognized by others who work in the same subject matter area as having knowledge that is greater in scope or depth than that of most people working in that area. The expert’s knowledge can come from education, experience, or both. We specifically identified researchers who focus on girls’ delinquency issues and practitioners who operate programs that address girls’ delinquency.

We contacted all 15 of the study group members. However, 1 member declined to be interviewed, and 3 study group members did not respond to requests for interviews.


presentations, academic journal articles, and published book. In addition, we interviewed OJJDP officials about these dissemination efforts, as well as 18 girls’ delinquency experts regarding their views on the composition of the study group.

To determine the findings from OJJDP’s efforts to assess the effectiveness of girls’ delinquency programs, and to assess how, if at all, OJJDP plans to address these findings, we analyzed documentation such as published bulletins and conference presentations about the study group’s findings and recommendations related to program effectiveness. We also interviewed OJJDP officials knowledgeable about the office’s planning efforts and the current and former study group principal investigators regarding the group’s findings and recommendations. We compared OJJDP’s stated plans with criteria in standard practices for program management.9

We conducted this performance audit from July 2008 through July 2009 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Results in Brief

To assess the effectiveness of girls’ delinquency programs, OJJDP established the Girls Study Group (Study Group). With an overall goal of developing research that communities need to make sound decisions about how best to prevent and reduce girls’ delinquency, the Study Group was established in 2004 under a $2.6 million multiyear cooperative agreement with a research institute. OJJDP’s objectives for the group, among others, included identifying effective or promising programs, program elements, and implementation principles (i.e., guidelines for developing programs) and developing program models to help inform communities of what works in preventing or reducing girls’ delinquency; identifying gaps in girls’ delinquency research and developing recommendations for future research; and disseminating findings to the girls’ delinquency field about effective or promising programs. To meet OJJDP’s objectives, among other things, the Study Group identified studies of delinquency programs that specifically targeted girls. The group then assessed the methodological quality of the studies using a set of criteria developed by DOJ’s Office of Justice Programs (OJP) called What Works to determine whether the studies provided credible evidence that the programs were effective at preventing or responding to girls’ delinquency.10

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9Program management standards we reviewed are reflected in the Project Management Institute’s The Standard for Program Management © (2006).

10The What Works criteria define six levels of effectiveness, including effective, promising, and ineffective, for use in assessing and classifying studies on the basis of their evidence of effectiveness. Additional details on these criteria are discussed later in this report.
OJJDP’s effort to assess girls’ delinquency programs through the use of a study group and the group’s methods for assessing studies were consistent with generally accepted social science research practices and standards, and OJJDP’s efforts to involve practitioners in Study Group activities and disseminate findings were also consistent with the internal control standard to communicate with external stakeholders.¹¹

- According to OJJDP officials—including the research coordinator—they formed the Study Group rather than funding individual studies of programs because study groups provide a cost-effective method of gaining an overview of the available research in an issue area. As part of its work, the group collected, reviewed, and analyzed the methodological quality of research on girls’ delinquency programs. The use of such a group, including its review, is an acceptable approach for systematically identifying and reviewing research conducted in a field of study. This review helped consolidate the research and provide information to OJJDP for determining evaluation priorities. Further, we reviewed the criteria the group used to assess the studies and found that they adhere to generally accepted social science standards for evaluation research. We also generally concurred with the group’s assessments of the programs based on these criteria.

- According to the group’s former principal investigator, the Study Group decided to use the What Works criteria to ensure that its assessment of program effectiveness would be based on highly rigorous evaluation standards, thus eliminating the potential that a program that may do harm would be endorsed by the group. However, 8 of the 18 experts we interviewed said that the criteria created an unrealistically high standard, which caused the group to overlook potentially promising programs. OJJDP officials stated that despite such concerns, they approved the group’s use of the criteria because of the methodological rigor of the framework and their goal for the group to identify effective programs.

- In accordance with the internal control standard to communicate with external stakeholders, OJJDP sought to ensure a range of stakeholder perspectives related to girls’ delinquency by requiring that Study Group members possess knowledge and experience with girls’ delinquency and demonstrate expertise in relevant social science disciplines. The initial Study Group, which was convened by the research institute and approved by OJJDP, included 12 academic researchers and 1 practitioner, a member with experience implementing girls’ delinquency programs. Eleven of the 18 experts we interviewed stated that this composition was imbalanced in favor of academic researchers, six of whom said that the composition led the group to focus its efforts on researching theories of girls’ delinquency rather than gathering and disseminating actionable information for practitioners.¹² According to OJJDP officials, they acted to address this issue by adding a second practitioner as a member and involving two other practitioners in study group activities. OJJDP officials stated that they plan to more fully involve practitioners from the beginning when they organize study groups in the future and to include practitioners in the remaining activities of the Study Group, such as

¹¹GAO/AIMD-00-21.3.1.

¹²The other seven experts did not express views regarding the balance of the study group’s composition.
presenting findings at a national conference. Also, in accordance with the internal control standard, OJJDP and the Study Group have disseminated findings to the research community, practitioners in the girls’ delinquency field, and the public through conference presentations, Web site postings, and published bulletins and plan to report on all of the group’s activities by spring 2010.

To address the Study Group findings that few girls’ delinquency programs had been studied and that the available studies lacked conclusive evidence of program effectiveness, OJJDP plans to provide technical assistance to help programs be better prepared for evaluation; however, more fully developing plans for supporting evaluations could help OJJDP address its girls’ delinquency goals. The Study Group found that the majority of the girls’ delinquency programs it identified—44 of the 61—had not been studied by researchers. For the 17 programs that had been studied, the Study Group reported that none of the studies provided conclusive evidence with which to determine whether the programs were effective at preventing or reducing girls’ delinquency. For example, according to the Study Group, 11 of the 17 studies lacked evidence of program effectiveness because, for instance, the studies involved research designs that could not demonstrate whether any positive outcomes, such as reduced delinquency, were due to program participation rather than other factors. Based on the results of this review, the Study Group reported that among other things, there is a need for additional, methodologically rigorous evaluations of girls’ delinquency programs; training and technical assistance to help programs prepare for evaluations; and funding to support girls’ delinquency programs found to be promising. According to OJJDP officials, in response to the Study Group’s finding about the need to better prepare programs for evaluation, the office plans to work with the group and use the remaining funding from the effort—approximately $300,000—to provide technical assistance workshop in October 2009. The workshop is intended to help approximately 10 girls’ delinquency programs prepare for evaluation by providing information about how evaluations are designed and conducted, how to identify appropriate performance measures, and how to collect data that will be useful for program evaluators in assessing outcomes. In addition, OJJDP officials stated that as a result of the Study Group’s findings along with feedback they received from members of the girls’ delinquency field, OJJDP plans to issue a solicitation in early fiscal year 2010 for researchers to apply for funding to conduct evaluations of two to five girls’ delinquency programs. OJJDP has also reported that the Study Group’s findings are to provide a foundation for moving ahead on a comprehensive program related to girls’ delinquency. However, OJJDP has not developed a plan that is documented, is shared with key stakeholders, and includes specific funding requirements and commitments and time frames for meeting its girls’ delinquency goals. Standard practices for program and project management state that specific desired outcomes or results should be conceptualized, defined, and documented in the planning process as part of a road map, along with the appropriate projects needed to achieve those results, supporting resources, and milestones. In addition, government internal control standards call for policies and procedures that establish adequate

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13 Project Management Institute, *The Standard for Program Management.*
communication with stakeholders as essential for achieving desired program goals.\textsuperscript{14} According to OJJDP officials, they have not developed such a plan because the office is in transition and is in the process of initiating efforts to develop an officewide research plan, but they are taking steps to address their girls’ delinquency goals, for example, through the workshop and planned evaluations. Developing such a plan would help OJJDP to demonstrate leadership to the girls’ delinquency field by clearly articulating the actions it intends to take to meet its goals and would also help the office to ensure that the goals are met.

To help ensure that OJJDP meets its goals to identify effective or promising girls’ delinquency programs and supports the development of program models, we are recommending that the Administrator of OJJDP develop and document a plan that (1) articulates how the office intends to respond to the findings of the Study Group, (2) includes time frames and specific funding requirements and commitments, and (3) is shared with key stakeholders. In commenting on a draft of this report, OJP agreed with our recommendation and outlined efforts that OJJDP plans to undertake to respond to the findings of the Study Group, which we describe in the report. OJP comments are reprinted in the enclosure.

Background

Over the past two decades girls have increasingly become involved in the juvenile justice system, and while the majority of juvenile arrests and cases involve boys, research has indicated that girls have more intensive treatment needs than boys. In 1980, 20 percent of all juvenile arrests were girls; by the mid-1990s about one quarter of these arrests were girls; and by 2007, girls accounted for 29 percent of all juvenile arrests. Additionally, while arrests for some violent crimes, such as assaults, have decreased for males, they have decreased less, or in some cases have increased, for females. For example, between 1998 and 2007 juvenile male arrests for simple assault declined 4 percent, and female arrests increased 10 percent.\textsuperscript{15} Further, from 1985 through 2005, the estimated number of girls’ delinquency cases involving detention increased by 92 percent, and those cases that involved probation increased by 88 percent. Research on girls has highlighted that delinquent girls have higher rates of mental health problems than delinquent boys, receive fewer special services, and are more likely to abandon treatment programs. For example, one study showed that detained girls have more symptoms of mental illness than would be predicted on the basis of gender or setting alone.\textsuperscript{16} Research has also shown that delinquent girls have higher mortality rates, dysfunctional and violent relationships, poor educational achievement, and less stable work histories than

\textsuperscript{14}GAO/AIMD-00-21.3.1.

\textsuperscript{15}The Study Group found that possible reasons for increased arrest rates for girls include changes in local law enforcement policies that lowered the threshold for reporting assaults or categorizing assaults as aggravated, reclassification of domestic dispute offenses as simple assaults that can result in arrest, and increased referrals to police resulting from schools’ zero tolerance policies for violence.

nondelinquent girls. Further, girls’ delinquency has been linked to drug abuse, mental health problems and disorders, poorer physical health, and victimization by and violence toward partners in adulthood.

In recent years, programs have been developed that specifically target preventing girls’ delinquency and intervening once girls have become involved in the juvenile justice system. In general, prevention programs provide services and programming, such as substance abuse education, mentoring, and life skills education, to deter girls from becoming involved in criminal or other antisocial activities. Intervention programs provide services to girls once they have entered the juvenile justice system, for example, through programs that are alternatives to probation or that provide intensive services for girls who are on probation, to prevent them from returning to the system or entering the adult criminal justice system. These services could include visits by probation officers, individual case plans, substance abuse treatment and therapy, funds for emergency situations, life skills courses, teen pregnancy services, and therapy sessions.

The Juvenile Justice and Delinquency Prevention Act (the Act) established OJJDP in 1974.\textsuperscript{17} As the only federal office charged exclusively with preventing and responding to juvenile delinquency and victimization and with helping states improve their juvenile justice systems, OJJDP supports its mission through a variety of activities, including: funding research and evaluation efforts, statistical studies, and demonstration programs; providing training and technical assistance; producing and distributing publications and other products containing information about juvenile justice topics; and administering a wide variety of grants to states, territories, localities, and public and private organizations through formula, block, and discretionary grant programs.\textsuperscript{18} Table 1 shows OJJDP’s enacted appropriations for fiscal years 2007 through 2009.

\textsuperscript{17}42 U.S.C. § 5611.

\textsuperscript{18}OJJDP allocates some formula and block grants to states on the basis of states’ juvenile populations, while others may be awarded on the basis of a fixed level to all states. Discretionary grants are generally awarded through a competitive process to state and local governments as well as individual agencies and organizations. Under the Act, “state” means any of the United States, the District of Columbia, the Commonwealth of Puerto Rico, the Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands. 42 U.S.C. § 5603.
Table 1: Juvenile Justice Appropriations Fiscal Years 2007 through 2009

<table>
<thead>
<tr>
<th>Line item</th>
<th>Funding by fiscal year</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>2007</td>
</tr>
<tr>
<td>Part A – Concentration of Federal Efforts(^a)</td>
<td>$703</td>
</tr>
<tr>
<td>Part B – State Formula Grants</td>
<td>78,976</td>
</tr>
<tr>
<td>Part D—Research, Evaluation, Technical Assistance and Training</td>
<td>0</td>
</tr>
<tr>
<td>Part E – Developing, Testing and Demonstrating Promising New Initiatives and Projects</td>
<td>104,670</td>
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<tr>
<td>Youth Mentoring Grants</td>
<td>9,872</td>
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<tr>
<td>Title V – Local Delinquency Prevention Incentive Grants</td>
<td>64,168</td>
</tr>
<tr>
<td>Project Childsafe(^b)</td>
<td>987</td>
</tr>
<tr>
<td>Secure Our Schools</td>
<td>14,808</td>
</tr>
<tr>
<td>VOCA—Improving Investigation and Prosecution of Child Abuse Program</td>
<td>14,808</td>
</tr>
<tr>
<td>Juvenile Accountability Block Grant Program(^c)</td>
<td>49,360</td>
</tr>
<tr>
<td>Total</td>
<td>$338,352</td>
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</table>


\(^a\) According to OJP’s fiscal year 2010 congressional budget submission, the Concentration of Federal Efforts program promotes interagency cooperation and coordination among federal agencies with responsibilities in the area of juvenile justice, as authorized by Part A of the Act, as amended.

\(^b\) Project Childsafe is a nationwide program to promote safe firearms handling and storage practices through the distribution of safety education messages and free gun-locking devices.

\(^c\) Under the Juvenile Accountability Block Grant Program, OJJDP provides funds to states and units of local government for the purpose of strengthening the juvenile justice system. These funds can be used for 17 different purpose areas, including establishing programs to help the successful reentry of juvenile offenders from state and local custody in the community or for hiring or training programs for detention and corrections personnel.

OJJDP, through its various grant programs, has provided funding to states and organizations to support girls’ delinquency programs, although it is not specifically required by the Act to fund such programs in particular. For example, to be eligible to receive formula grants, states are required to submit a plan to OJJDP for providing gender-specific services for juvenile delinquency prevention and treatment.\(^19\) However, the states generally have the authority to determine how formula and block grants are allocated and may use these funds to support a range of program areas, including programs specifically for delinquent girls. For example, for fiscal years 2007 and 2008, OJJDP reported that states used approximately $1.9 million in Part B formula grant money for girls’ delinquency programs, representing approximately 1 percent of such funding for those years. In addition, in fiscal year 2007, OJJDP reported awarding about $1.8 million in discretionary grant awards to prevention and intervention programs addressing girls’ delinquency.\(^20\)


\(^20\) OJJDP did not report awarding discretionary grants for girls’ programs in fiscal year 2008, and as of June 2009, OJJDP had not awarded fiscal year 2009 discretionary grants.
The Act requires the OJJDP Administrator to conduct and support evaluations and studies of the performance and results achieved by federal juvenile delinquency programs and activities, although the law does not specifically require OJJDP to fund evaluations of state or locally funded programs or those specifically focused on girls’ delinquency. OJJDP has provided funding for evaluations using (1) funds appropriated for Part D of the Act—which allows the Administrator to conduct research and evaluation, information dissemination, and training and technical assistance, or (2) funds set aside from several of its appropriations accounts for use for research, evaluation, and statistics activities. Funding has not been appropriated to OJJDP for Part D since fiscal year 2005 when it received $10 million, so OJJDP has allocated funding for research and evaluation of programs from fiscal years 2006 through 2008 using approximately $40 million in funding from appropriation set asides.

OJJDP has provided funding for several efforts designed to provide information about girls’ delinquency programs to the juvenile justice field in the past decade. For example, in 1998, the office published an inventory of best practices that included a list of 16 promising girls’ delinquency programs, which had been compiled by a research organization as part of a $1.1 million cooperative agreement to provide training and technical assistance to states and localities about girls’ programs. The research organization identified these 16 programs on the basis of programmatic criteria—such as whether the program used appropriate assessments to determine treatment plans; provided empowerment strategies, such as skill training and vocational training; or provided its staff with gender-specific training—rather than on whether the program’s effectiveness had been studied by researchers. Further, this effort found that more research was needed to draw conclusions about the effectiveness of girls’ delinquency program models. In addition, during this time OJJDP spent approximately $1.1 million to fund four studies of girls’ delinquency issues. While these studies assessed issues related to girls’ delinquency, they did not specifically assess the effectiveness of girls’ delinquency programs. For example, in 2000, OJJDP funded one study of women in gangs, which found, among other things, that the optimum time for prevention and

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23 Appropriations statutes for fiscal years 2006 through 2008 provided that OJJDP may use not more than 10 percent of each amount appropriated for research, evaluation, and statistics activities that benefit the programs or activities authorized, and not more than 2 percent of each appropriated amount for training and technical assistance. See, e.g, Consolidated Appropriations Act, 2008, Pub. L. No. 110-161, 121 Stat. 1844, 1906-07 (2007). This provision applied to appropriation accounts under Juvenile Justice Programs, but did not apply to amounts appropriated for demonstration projects, as authorized by sections 261 and 262 of the Act, 42 U.S.C. §§ 5665-66.

24 The $40 million comprises set asides eligible to be used for research and evaluation of girls’ delinquency programs. As of July 2009, OJJDP has not determined how it would use its fiscal year 2009 appropriation set asides.

intervention was the middle teen years and that the optimum place for intervention was school before girls drop out. Another study compared three treatment models to determine which was most effective at reducing the number of institutional placements for adjudicated female offenders. The study found that girls with the most serious and frequent crises were more dissatisfied with social services or were denied access to such services. The study highlighted the importance of youth assistance programs to provide opportunities for girls to develop pro-social skills through family, school, and community connections.

**OJJDP Established the Girls Study Group to Assess the Effectiveness of Girls’ Delinquency Programs**

OJJDP initiated the Study Group to assess the effectiveness of girls’ delinquency programs. In response to increases in girls’ arrests through the 1990s and early 2000s and questions about the causes of these increases and how best to respond to the needs of girls entering the juvenile justice system, OJJDP issued a program announcement in 2003 for a study group to focus on girls’ delinquency issues. While OJJDP had funded studies on girls’ issues and a technical assistance effort to assist girls’ delinquency programs in their operations, in forming the Study Group, OJJDP determined that a comprehensive, research-based foundation was needed to guide state and local policymakers and practitioners in their efforts to effectively prevent and reduce girls’ delinquency. In its announcement for the Study Group, OJJDP highlighted the need for more information about female development and female-specific delinquency risk factors, as well as the effectiveness of girls’ delinquency programs to ensure the best services and treatment. OJJDP sought applications from public and private organizations to convene a study group to address these issues and in 2004 awarded a 2-year cooperative agreement to Research Triangle Institute (RTI) to do so. OJJDP has since provided RTI with an extension through June 2010 to complete all of the Study Group’s activities. The total funding awarded for the cooperative agreement was almost $2.6 million.

OJJDP articulated five broad objectives for the Study Group in its September 2003 program announcement. Three of these objectives specifically related to assessing and promoting girls’ delinquency programs: (1) identifying effective or promising programs,
program elements, and implementation principles to help inform communities about what works in preventing or reducing girls’ delinquency and to support the development of these program models; (2) identifying gaps in girls’ delinquency research and developing recommendations for future research to fill these gaps; and (3) disseminating findings to the girls’ delinquency field about effective or promising programs. The other two objectives included understanding the trends and consequences related to girls’ delinquency and developing a comprehensive theory of girls’ delinquency.27

To meet OJJDP’s program assessment objectives, among other activities, the Study Group conducted a review of the literature on girls’ delinquency that included over 1,000 documents in relevant research areas, such as criminological and feminist explanations for girls’ delinquency, patterns of delinquency, and the justice system’s response to girls’ delinquency. To identify girls’ delinquency programs, from June 2005 through October 2006, the Study Group analyzed the results of this literature search, conducted Web searches, reviewed juvenile justice 3-year plans from 2000 to 2004 for all 50 states, reviewed federal agency and private organization lists of delinquency programs, and solicited suggestions on its Web site.28 The Study Group initially set out to identify federally funded girls’ delinquency programs but expanded its search to include state and locally funded programs after it found few federally funded programs. As a result, the Study Group identified 61 programs that specifically targeted preventing or responding to girls’ delinquency. The group then determined which of these programs had been studied for program effectiveness by conducting Web searches for evaluation materials and published research, reviewing abstracts from academic journals, contacting program directors, and reviewing program Web sites.

To identify effective programs, the Study Group reviewed the studies of girls’ delinquency programs that it identified and classified them based on evidence of their effectiveness. To make this determination, the Study Group compared the studies’ methodologies to criteria established in the OJP What Works classification framework, which defines six levels of evidence of effectiveness, which are effective, effective with reservation, promising, and ineffective, as well as inconclusive evidence and insufficient evidence, as described in table 2.29

27Specifically, the Study Group’s objective to understand the trends and consequences of girls’ delinquency involved increasing research-based knowledge about the risk and protective factors related to girls’ delinquency and determining the patterns and consequences of juvenile justice decisions on female offenders. The objective on developing a comprehensive theory of girls’ delinquency involved examining the extent to which theories developed primarily to explain boys’ delinquency applied to girls, as well as exploring whether theories that had been developed for girls were useful in developing and testing new prevention and intervention strategies.

28Under the Act, states are required to submit 3-year plans to OJJDP outlining their activities for investing in delinquency prevention and for coordinating services delivered to at-risk juveniles and their families, among other things. 42 U.S.C. § 5633.

29A multiagency working group led by DOJ’s OJP, which included the Department of Health and Human Services and the Department of Education, developed the classification framework and criteria from 2004 to 2005 to support a planned What Works repository to assist communities in selecting and replicating evidence-based programs that was never implemented. Federal government efforts to develop repositories of evidence-based programs have continued under Find Youth Info, the Substance Abuse and Mental
Table 2: Summary of What Works Criteria Used by the Girls Study Group to Assess Studies of Girls’ Delinquency Programs

<table>
<thead>
<tr>
<th>Level of effectiveness</th>
<th>Description</th>
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<tr>
<td>Effective</td>
<td>Effective programs have studies with a randomized controlled research design. These are designs that compare the outcomes for individuals that are randomly assigned either to the program or to a nonparticipating control group before the intervention in an effort to control for any systematic difference between the groups that could account for a difference in their outcomes. Effective programs also demonstrate a significant and sustained effect—that is, statistically significant positive outcomes that remain for at least 1 year after subjects stop participating in a program. The program should have been replicated at least once externally at another site to confirm results.</td>
</tr>
<tr>
<td>Effective with reservation</td>
<td>These programs have studies with a randomized controlled research design that demonstrates a significant and sustained effect. A program should have at least one replication to confirm results. Reservations occur either because the program has only an internal replication at the same site or because it has an external replication with modest results.</td>
</tr>
<tr>
<td>Promising</td>
<td>Promising programs have either studies with (1) a randomized controlled research design without a replication or (2) a quasi-experimental research design. These programs have significant and sustained effects.</td>
</tr>
<tr>
<td>Insufficient evidence</td>
<td>These are studies of programs that have a quasi-experimental research design that lack sufficient methodological rigor, or have a pre-post test design that involves tests that analyze measures before and after individuals participated in the program.</td>
</tr>
<tr>
<td>Inconclusive evidence</td>
<td>These studies of programs may have adequately rigorous research designs but not sustained effects, or they may have contradictory findings and not enough evidence demonstrating that the programs are either effective or ineffective.</td>
</tr>
<tr>
<td>Ineffective</td>
<td>These are studies of programs that have an experimental or quasi-experimental research design that failed to demonstrate a significant effect in an initial study or in a replication.</td>
</tr>
</tbody>
</table>

Source: GAO analysis of OJP What Works criteria.

According to the Study Group’s principal investigator, as of May 2009, the group had finalized its program review findings and was in the process of finishing a bulletin on these findings before providing it to OJJDP for publication. As of June 2009, OJJDP has issued three bulletins on several of the group’s activities. These bulletins have provided an overview of the Study Group’s activities and the group’s findings on its two objectives related to girls’ delinquency risk factors and patterns of offending. According to OJJDP officials, the Study Group plans to issue a final report that summarizes all of its activities and findings to OJJDP by spring 2010.

**OJJDP Efforts to Assess Program Effectiveness Were Consistent with Social Science Practices and Standards, and OJJDP Has Taken Action to Enhance Its Communication about Study Group Activities and Findings with External Stakeholders**

OJJDP’s efforts to assess program effectiveness through the use of a study group as well as the group’s efforts were consistent with generally accepted social science practices and standards, although experts we interviewed presented differing views on the criteria used to assess programs. OJJDP also took action to include external stakeholders in

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Health Services Administration’s National Registry of Evidence-Based Programs and Practices, and the OJJDP Model Programs Guide. Even though the repository was never implemented, the criteria within its framework are still valid to use in assessing evidence of program effectiveness.
study group activities and is disseminating the group’s findings consistent with standards for control in the federal government.

The Use of a Study Group and the Group’s Efforts Were Consistent with Generally Accepted Social Science Practices and Standards; However, Experts We Interviewed Presented Differing Views on the Criteria Used to Assess Programs

OJJDP’s efforts to assess girls’ delinquency programs, including its approach of using a study group and the group’s methods of assessing studies, were consistent with generally accepted social science standards for evaluation research. According to OJJDP officials, including the research coordinator, they chose to form a study group rather than fund individual evaluations of programs because study groups are a cost-effective method of gaining an overview of the available research in an issue area. As part of its work, the group collected, reviewed, and analyzed the methodological quality of research on girls’ delinquency programs. Such an approach of systematically identifying and reviewing research conducted in a field of study is an acceptable practice to consolidate the research in an area and provide information to enable program managers to determine where they might best commit future evaluation resources. Thirteen of the 18 girls’ delinquency experts we interviewed (including 11 Study Group members) stated that the Study Group’s efforts were useful for providing an overview of girls’ delinquency issues. However, 6 experts (including 2 Study Group members) also noted that it would have been beneficial to the girls’ delinquency field for the group to conduct evaluations to determine program outcomes or promising models rather than reviewing completed studies. OJJDP has funded individual studies of girls’ delinquency programs in the past but, according to OJJDP officials, was seeking to use the Study Group’s research to form a baseline of the available knowledge about girls’ delinquency issues.

The Study Group’s effort to review the studies according to the What Works criteria was consistent with generally accepted social science standards. Specifically, we reviewed the OJP What Works criteria and found that they adhere to these standards for evaluation research. Using the What Works criteria, we also assessed the same studies for the 17 girls’ delinquency programs that the Study Group had reviewed and generally concurred with the Study Group’s ratings of the program studies. While the Study Group’s use of the What Works criteria was in keeping with social science standards, experts we interviewed expressed differing views on the group’s decision to use these criteria. According to the Study Group’s former principal investigator, the group decided to use the What Works criteria in 2005 because the criteria ensured that the group’s assessment of the effectiveness of programs in preventing or reducing girls’ delinquency would be based on highly rigorous evaluation standards to identify effective programs—thus eliminating the potential that a program that may do harm would be endorsed by the group. Eight Study Group members we interviewed also stated that the Study Group’s use of the criteria was appropriate because it ensured that the group would only disseminate information on programs determined to be effective based on a high level of

[30]The approach used by OJJDP is similar to the evaluation synthesis methodology described in GAO, The Evaluation Synthesis, GAO/PEMD-10.1.2 (Washington, D.C.: March 1992). This type of approach might also be termed systematic review.
evidence. However, 8 other experts, including three Study Group members, said that the criteria created an unrealistically high standard, which caused the Study Group to overlook potentially promising programs.\(^{31}\) Further, 9 of the 18 experts (including five Study Group members) we interviewed also noted that requiring a randomized controlled research design—a research design that compares the outcomes for individuals who are randomly assigned to either the program being studied or to a nonparticipating control group before the intervention—to demonstrate effectiveness, as the What Works criteria does, is a difficult standard to achieve because such a design is expensive, and programs may be reluctant to divert resources from programming to pay for evaluations. OJJDP officials stated that they understood the experts’ concerns and the trade-offs in using a classification framework that requires a randomized controlled research design to demonstrate effectiveness; however, they approved the group’s use of the criteria because it provided a rigorous framework for assessing program evaluations. We understand that studies can produce valid results using other research designs, such as studies using quasi-experimental designs or studies comparing the outcome results for groups of girls that are statistically matched. We have also previously reported that randomized controlled research designs provide researchers with the best method for assessing a program’s effectiveness—they isolate changes caused by the program from other factors—when doing so is feasible and ethical.\(^{32}\)

OJJDP Has Taken Actions to Reach Out to External Stakeholders on Study Group Activities and Findings and Is Disseminating the Findings in Keeping with Internal Control Standards

OJJDP has taken action to reach out to external stakeholders to address concerns about the composition of the Study Group after its initial formation and, moving forward, plans to continue to incorporate program practitioners in its planned efforts. \textit{Standards for Internal Control in the Federal Government} states that program managers should ensure that there are adequate means of obtaining information from and communicating with external stakeholders who may have a significant impact on the agency achieving its goals.\(^{33}\) Regarding gaining information from external stakeholders, OJJDP’s program announcement for the Study Group sought to ensure a range of stakeholder perspectives related to girls’ delinquency. The announcement required that the members of the Study Group possess knowledge of and experience with female development and delinquent girls and demonstrate expertise in a variety of relevant social science disciplines, such as criminology, sociology, and developmental psychology. In awarding the cooperative

\(^{31}\)Two experts we interviewed did not express a view on the group’s approach to evaluating programs.


\(^{33}\)GAO/AIMD-00-21.3.1.
agreement to RTI through a peer review process, OJJDP approved the RTI proposal for the Study Group as responding to the requirements and expectations of the program announcement. Consistent with the fields of expertise cited in the program announcement, RTI convened a group of 13 members, including 12 academic researchers from social science disciplines and one practitioner, a member directly involved in girls' delinquency programming. However, according to several of the experts we interviewed, this Study Group composition did not include sufficient representation and input from a key external stakeholders group—girls’ delinquency program practitioners. For example, 11 of the 18 girls’ delinquency experts we interviewed, including 5 study group members, said that the Study Group was imbalanced in favor of academic researchers, 6 of whom (including 2 study group members) said that the composition led the group to focus its efforts on researching theories of girls’ delinquency rather than gathering and disseminating actionable information for practitioners. According to OJJDP officials we interviewed, they had received feedback from girls’ delinquency stakeholders in 2006 on this issue. In response, according to OJJDP program managers, they acted to address the imbalance of the Study Group by adding a second practitioner as a member and involving 2 other practitioners in group activities, such as presenting successful girls’ delinquency program practices at conferences and reviewing the group’s work products. OJJDP officials stated that as a lesson learned, they plan to more fully involve practitioners from the beginning when they organize study groups in the future. In addition, OJJDP officials noted that specific to the Study Group, they plan to continue to reach out to obtain information from and include practitioners in the remaining activities of the group, such as presenting findings at a national juvenile justice conference.

OJJDP and the Study Group have disseminated the group’s findings to the research community, practitioners in the girls’ delinquency field, and the public in a variety of ways, and in doing so have made efforts to respond to stakeholder concerns. In its 2003 program announcement, in keeping with the internal control standard for communicating with stakeholders, OJJDP required that the Study Group disseminate its findings through publications and products that address the needs of various practitioner audiences in diverse fields, including juvenile justice, child welfare, mental health, and substance abuse prevention. Since 2004, Study Group principal investigators and group members have presented findings at 24 conferences and posted the presentation slides to the group’s Web site. OJJDP has also published three bulletins on the Study Group’s activities and findings. Six girls’ delinquency experts we interviewed (including five Study Group members) stated that the information disseminated was generally helpful because it provided a useful overview of girls’ delinquency trends and research.

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34 The Study Group members represented 11 of the 12 disciplines specified in the program announcement.
35 The other seven experts did not express views regarding the balance of the study group’s composition.
36 In addition to the practitioner, OJJDP also added an expert in program evaluation as a group member after the group had begun its activities.
However, 10 of the 18 experts we interviewed (including three Study Group members) also noted that some of the group’s dissemination efforts created confusion among practitioners because Study Group members presented findings that did not acknowledge factors that practitioners believed contribute to girls’ delinquency, such as traumatic life experiences. According to OJJDP officials, in response to feedback they received from girls’ delinquency stakeholders about such concerns, the office and the Study Group sponsored workshop sessions at a conference for juvenile justice practitioners where the group clarified its findings and sought practitioner input on subjects such as delinquency risk and protective factors and trends in girls’ delinquency. According to OJJDP officials, the office and the Study Group plan to continue disseminating the group’s findings by issuing four additional bulletins and by presenting the findings at a national conference on juvenile delinquency.

**In Response to Study Group Findings of No Evidence of Effective Girls’ Delinquency Programs, OJJDP Plans Technical Assistance to Help Programs but Could Strengthen Its Plans for Supporting Evaluations**

The OJJDP-sponsored Study Group found that no programs in its review had evidence of effectiveness and, among other things, that additional support for program evaluation is needed. To address these findings, OJJDP plans to provide technical assistance to help girls’ delinquency programs so that they will be better prepared to be evaluated. However, by articulating time frames and specific funding requirements and commitments in its plans to support evaluations, OJJDP could better address its goals for preventing and reducing girls’ delinquency.

**The Study Group Found No Evidence of Effective Girls’ Delinquency Programs to Promote as Models and, among Other Things, That Evaluation Is Needed**

In its review of girls’ delinquency programs, the Study Group’s findings showed that the majority of the programs it identified—44 of 61—had not been studied by researchers, while 17 of the programs had been the subject of published studies. The Study Group determined that none of the 17 programs that had been studied had conclusive evidence of their effectiveness. Specifically, the Study Group found that the studies provided insufficient evidence of the effectiveness of 11 of these 17 programs. For example, our review of one study that the Study Group assessed as having insufficient evidence showed that the study had a quasi-experimental design but lacked methodological rigor in that the treatment and comparison groups had small sample sizes and did not appear to be well matched, and any statistical tests reported were only performed on treatment group participants. The Study Group found that for the remaining 6 programs, the studies provided inconclusive evidence of effectiveness. For example, our review of one study that the group assessed as having inconclusive evidence showed statistically significant results for the program; however, sustained effects were not indicated for at least a 1-year period beyond the end of the intervention. Further, it was unclear whether

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38A quasi-experimental design is a controlled study where study participants are assigned in a nonrandom manner to a treatment group (individuals participating in the program being studied) or a comparison group (individuals closely resembling those in the treatment group on many demographic variables but not participating in the program).
the study participants were representative of the population of girls that the program was designed to reach. As a result, there was not enough evidence to demonstrate that the program was either effective or ineffective for the intended population of delinquent girls. Among the other findings that the Study Group reported was that 7 of the 17 programs it assessed were no longer in operation, primarily because the initial grants that supported their operations were not renewed.

Based on its review of girls’ delinquency programs, the Study Group reported several conclusions and recommendations. Among these conclusions and recommendations is the need for evaluations and support of girls’ delinquency programs. In particular, the Study Group found that insufficient funding has been provided for evaluations of girls’ delinquency programs, so definitive conclusions of what works for girls cannot be made. Further, the Study Group found that additional, methodologically rigorous evaluations of girls’ delinquency programs are needed in order to identify effective and promising programs and models that could be replicated at the state and local levels. While the Study Group did not specifically quantify the funding needed to support these evaluations, it did note that federal sources for evaluation funding and partnerships with local colleges and universities are needed. The Study Group also concluded that programs need technical assistance to help them prepare for evaluations. Lastly, the group found that girls’ delinquency programs that are based on evidence of promising techniques should be supported and expanded. In particular, the Study Group highlighted program sustainability as an issue, stating that funding needs to be provided to ensure that the most promising programs continue to operate after their initial funding period is over so that practitioners and policymakers can continue to implement them.

**OJJDP Plans to Provide Technical Assistance to Help Programs, but Could More Fully Develop Plans for Supporting Evaluations to Address Its Goals to Prevent and Reduce Girls’ Delinquency**

OJJDP has plans to provide technical assistance to girls’ delinquency programs; however, its plans for supporting evaluations could be more fully developed to help OJJDP reach its goals for addressing girls’ delinquency issues. OJJDP’s goals for addressing girls’ delinquency, as stated in the Study Group program announcement, are to identify effective and promising programs, program elements, and implementation principles and support the development of program models to prevent and reduce girls’ delinquency. According to OJJDP officials, in response to the group’s finding about the need to better prepare programs for evaluation, the office plans to work with the Study Group and using the remainder of its funding—approximately $300,000—provide a technical assistance workshop in October 2009 to help about 10 girls’ delinquency programs prepare to be evaluated. In this workshop, OJJDP and the Study Group plan to provide information to programs about how evaluations are designed and conducted, how to identify appropriate performance measures, and how to collect data needed for program evaluators to assess outcomes. OJJDP officials stated that the programs are to be selected for participation through an application process and have to meet minimum criteria, including having experience working with girls and the capability to collect program outcome data. OJJDP officials noted that they intend to limit participation in the workshop to about 10 programs to ensure that the programs that are selected receive
technical assistance that is targeted to their specific needs. This assistance, according to OJJDP officials, will help ensure that when programs do undergo evaluations—whether funded by OJJDP, another federal agency, or an independent research organization—the evaluations will be more likely to lead to conclusive findings on program effectiveness.

In addition to providing girls’ delinquency programs with training and technical assistance, OJJDP officials also described their plan to fund evaluations of girls’ delinquency programs. OJJDP officials stated that as a result of the Study Group’s findings along with feedback they received from members of the girls’ delinquency field, they recognized the need for evaluations of girls’ delinquency programs. OJJDP officials stated that they recognized the need for evaluation in fiscal year 2007 but at the time lacked funding to issue a solicitation for such evaluations. Further, 14 of the 18 girls’ delinquency experts that we interviewed (including nine Study Group members) emphasized the need for OJJDP leadership in supporting evaluations of girls’ delinquency programs to identify effective programs. For example, one expert noted that since the Study Group found that few programs had been studied, OJJDP would be doing a disservice to the girls’ delinquency field if it did not fund rigorous evaluations and help programs partner with research organizations. According to the OJJDP officials, the office’s goal is to issue a solicitation in early fiscal year 2010 for researchers to apply for funding to conduct evaluations of two to five girls’ delinquency programs. These evaluations, according to OJJDP officials, are to focus on girls’ delinquency programs that have been in operation for a number of years and have data to support evaluations. The officials also stated that the planned solicitation would require researchers to conduct studies that involve either randomized controlled or quasi-experimental research designs.

OJJDP officials stated that they expect to fund evaluations using the portion of appropriation accounts that has been available for research and evaluations, and noted that the number of evaluations to be allocated funding depends, in part, on the number of applications received, the total available funding, as well as other competing research needs and goals. While OJJDP has not yet received an appropriation for fiscal year 2010, OJJDP used approximately $12 million in fiscal year 2007 and $14 million in fiscal year 2008 to support research and evaluations from accounts eligible to support research and evaluations of girls’ delinquency programs. OJJDP officials stated that they used this funding because in recent years they have not received an appropriation for programs and activities authorized under Part D, which is specifically designated for research and evaluation, but if they were to receive a Part D appropriation they could increase the number of evaluations funded. While OJJDP officials verbally described the planned evaluations and funding, they did not provide us with written documentation of the planned solicitation because, as of June 2009, it was in draft and subject to change.

OJJDP officials have described actions they plan to take to respond to the Study Group’s findings, and OJJDP reported that these findings will provide a foundation for creating a comprehensive program of information dissemination, training, technical assistance, and programming to help prevent and reduce girls’ delinquency. However, the office has not developed a plan that is documented, is shared with key stakeholders, and includes time frames and specific funding requirements and commitments for meeting its girls’
delinquency goals. According to OJJDP officials, they have not developed such a plan because the office is in transition and is in the process of initiating efforts to develop an officewide research plan, but they are taking steps to address their girls’ delinquency goals, for example, through the workshop and planned evaluations. Standard practices for program and project management state that specific desired outcomes or results should be conceptualized, defined, and documented in the planning process as part of a road map, along with the appropriate projects needed to achieve those results, supporting resources, and milestones.\(^39\) *Standards for Internal Control in the Federal Government* states that program managers should ensure that there are adequate means of obtaining information from and communicating with external stakeholders who may have a significant impact on the agency achieving its goals.\(^40\) We have also previously reported that critical to guiding evaluation and research efforts on a national level is a strategy that outlines a process for funding and conducting rigorous evaluations and research, identifies the resources needed to achieve it, and assigns accountability for accomplishing these actions.\(^41\) In that regard, developing a plan that provides a road map to meeting its goals would provide additional assurance that OJJDP’s goals for identifying and promoting promising programs and program models would be met and communicated to state and local policymakers and practitioners responsible for implementing programs to prevent and reduce girls’ delinquency.

**Conclusions**

Preventing and responding to girls’ delinquency have been a concern for federal, state, and local governments as well as private and nonprofit juvenile justice organizations for over a decade, and the most recent statistics show that girls’ involvement in the juvenile justice system is not stabilizing or declining. While OJJDP has undertaken a 6-year, $2.6 million study group effort to learn about effective and promising girls’ delinquency programs, the lack of rigorous studies of such programs meant that the group was unable to identify and promote effective programs and to develop program models to be supported at state and local levels. In response to these findings, OJJDP has taken steps to provide technical assistance to programs to help prepare them for evaluations and has described plans for funding evaluations of girls’ delinquency programs. While these steps are consistent with OJJDP’s stated goals, the office lacks a comprehensive documented plan that includes time frames and specific funding requirements and commitments for meeting its girls’ delinquency goals that it can share with stakeholders. As the Study Group plans to conclude its efforts in spring 2010, OJJDP is planning to help ensure the

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\(^39\) Project Management Institute, *The Standard for Program Management*.

\(^40\) GAO/AIMD-00-21.3.1.

development of effective girls’ delinquency programs and program models by providing training and technical assistance to help these programs plan for future evaluations. Moreover, such action better positions OJJDP in ensuring that funding for such programs is directed to those that are effective in preventing girls’ delinquency and intervening after girls have entered the juvenile justice system. As states are continuing to make determinations about how to allocate their formula and block grants, and OJJDP continues to provide funding to programs through some of its discretionary grant programs, information about promising or effective programs and program models could help guide these resource decisions. Developing a plan with time frames that clearly articulates the office’s approach to its evaluation efforts, including available resources needed and committed toward implementing that plan, would help OJJDP ensure that its goals to support the development of effective programs are met, and sharing that plan with stakeholders would help demonstrate federal leadership to the girls’ delinquency field.

Recommendation for Executive Action

To help ensure that OJJDP meets its goals to identify effective or promising girls’ delinquency programs and supports the development of program models, we recommend that the Administrator of OJJDP develop and document a plan that (1) articulates how the office intends to respond to the program findings of the Study Group, (2) includes time frames and specific funding requirements and commitments, and (3) is shared with key stakeholders.

Agency Comments and Our Evaluation

We requested comments on a draft of this report from the Attorney General. On July 16, 2009, we received written comments from OJP, which are reprinted in the enclosure.

OJP agreed with our recommendation and stated that OJJDP has always intended to respond to the findings of the Study Group. OJP described efforts planned in response to the findings of the Study Group, including a technical assistance workshop and evaluations, which we have discussed in our report. OJP also stated that subsequent refined plans and related funding commitments will be based on the outcome of these activities and noted that OJJDP, in accordance with the Act, will publish these program plans in the Federal Register for review and comment by key stakeholders as well as members of the public by December 2009.

We recognize that OJJDP’s planned activities represent a worthwhile step in responding to the findings from the Study Group effort, and are encouraged that OJJDP intends to publish a program plan, to include how it will address girls’ delinquency issues. However, it is important to note that while OJJDP has been required to publish a program plan annually according to the Act, it has not done so since 2002. Following through on its current pledge to issue such a plan by December of this year will help provide OJJDP with reasonable assurance that it has a well-thought-out approach to ensure that its goals

for preventing and reducing girls’ delinquency are met. We also continue to maintain that it will be important for this plan to include more than a list of activities in response to the Study Group’s findings as OJJDP describes in commenting on this report. Specifically, the plan should serve as a road map for OJJDP’s approach for responding to the Study Group’s findings, establish overall time frames as well as those for each activity, specify funding requirements and associated commitments, and integrate the input of key stakeholders, such as girls’ delinquency practitioners. Publishing and implementing such a plan would help OJJDP ensure that it meets the goal it articulated at the beginning of the 6-year Study Group effort—to identify effective and promising programs, program elements, and implementation principles and to support the development of program models to prevent and reduce girls’ delinquency.

We are sending copies of this report to interested congressional committees, the Attorney General, and other interested parties. In addition, this report will be available at no charge on GAO’s Web site at http://www.gao.gov.

If you or your staff have any questions concerning this report, please contact me at (202) 512-6510 or larencee@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Mary Catherine Hult, Assistant Director; David Alexander; Elizabeth Blair; Amy Brown; Kevin Copping; Katherine Davis; Dawn Locke; and Janet Temko made key contributions to this report.

Sincerely yours,

Eileen Regen Larence
Director, Homeland Security
and Justice Issues

Enclosure
Enclosure

Comments from the Department of Justice

U.S. Department of Justice
Office of Justice Programs
Office of Audit, Assessment, and Management

JUL 16 2009

Ms. Eileen R. Laurence
Director, Homeland Security and Justice Issues
Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Laurence:

Thank you for the opportunity to comment on the draft Government Accountability Office (GAO) letter report entitled “Juvenile Justice: Technical Assistance and Better Defined Evaluation Plans Will Help to Improve Girls’ Delinquency Programs” (GAO-09-721R). The Office of Justice Programs agrees with the Recommendation for Executive Action, which is restated in bold text below and is followed by our response.

To help ensure that OJJDP meets its goals to identify effective or promising girls’ delinquency programs and supports the development of program models, we recommend that the Administrator of OJJDP develop and document a plan, that (1) articulates how the agency intends to respond to the program findings of the Girls Study Group, (2) includes time frames and specific funding requirements and commitments, and (3) is shared with key stakeholders.

It has always been the intention of the Office of Juvenile Justice and Delinquency Prevention (OJJDP) to respond to the findings of the Girls’ Study Group. As discussed with the GAO during the review, OJJDP has efforts underway, as well as planned initiatives to address the findings. These planned initiatives, and timeframes for implementation, are described below. Further planning and funding commitments will be based on the outcome of these activities.

- **Hands-On Evaluation Technical Assistance Workshop for Girls’ Delinquency Programs**

The workshop is scheduled for October 28-30, 2009, in Chapel Hill, NC. The goal of the workshop is to better equip programs to conduct rigorous evaluations of their interventions. Unlike general workshops, the Girls’ Study Group Evaluation Technical Assistance Workshop will tailor instruction specifically to address the needs of participating programs. The faculty at the workshops will be highly skilled in evaluation methodology, program development, and strategies on how to partner with evaluation professionals. Each participant will leave the workshop with a
customized concrete plan for ‘next steps’ and upon request will receive an additional hour of technical assistance by phone following the workshop.

Eligibility will be limited to programs that provide gender-responsive delinquency prevention or interventions for girls, and who have some level of evaluation experience. Organizations that have more than one distinct gender responsive program are eligible to submit more than one application. There will be a two-phase application process. The first phase will require the submission of general program information and a description of current evaluation history/experience. Program applications will be reviewed based on their program type and evaluation needs; and approximately 15 to 20 programs will be invited to proceed to the next application phase. Those applicants selected for the second phase will be asked to submit more detailed information on the evaluation needs of their programs and reports or findings based on previous evaluation work. The workshop organizers will use this information to determine which programs provide the best fit between evaluation needs and faculty expertise. Approximately 10 programs will ultimately be invited to participate in the workshop. Selection of participants for the workshop will be completed by the end of September 2009.

- **Enhancement of OJJDP’s Current Girls Delinquency Training and Technical Assistance Curriculum**

  Using a panel of experts (including staff from the Girls’ Study Group, among others), OJJDP will update, enhance, and revise the existing Training and Technical Assistance Curriculum for Girls’ Delinquency Programming. The targeted completion date is December 2009.

- **Release of the FY 2010 Evaluation of Girls’ Delinquency Programs Solicitation**

  This solicitation will be released, pending availability of funds, for the purpose of encouraging partnerships between girls’ delinquency programs and evaluators, and providing funding for experimental and quasi-experimental evaluations of girls’ delinquency programs.

In response to the findings of the Girls’ Study Group, OJJDP has planned the above described initiatives. Subsequent refined plans and related funding commitments will be based on the outcome of these initiatives. As mandated by the Juvenile Justice and Delinquency Prevention Act, the OJJDP will publish these program plans in the Federal Register for review and comment by key stakeholders as well as members of the public. OJJDP anticipates publishing the program plan in the Federal Register by December 2009.
If you have any questions regarding this response, you or your staff may contact Maureen Henneberg, Director, Office of Audit, Assessment, and Management, on (202) 616-3282.

Sincerely,

Laurie O. Robinson
Acting Assistant Attorney General

cc: Beth McGarry
Deputy Assistant Attorney for Operations and Management

Jeffrey Slowikowski
Acting Director
Office of Juvenile Justice and Delinquency Prevention

Maureen Henneberg
Director
Office of Audit, Assessment, and Management

LeToya A. Johnson
Audit Liaison
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Richard P. Theis
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Department of Justice
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