



# Federal Grants Management: Improving Transparency

by Shelley H. Metzenbaum



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## Introduction

Grants are an important tool the U.S. federal government uses to contribute to a better world. Through authorization and appropriation, federal lawmakers determine which outcome objectives the federal government will advance using grants. By inviting grant applications, federal grant-giving agencies find government and nonprofit partners interested in advancing these outcome objectives with support from federal and often other funders. Following grant award, federal agencies manage grants to make progress on their outcome objectives. How the federal government manages grants to improve outcomes—including the roles and responsibilities of federal officials as well as the opportunities afforded by evolving technologies, knowledge, and know-how—is explored in *Federal Grants Management: Improving Outcomes*, a report published by the IBM Center for The Business of Government.

That report argues that effective communication of data, data analyses, and the findings of well-designed trials to key users—especially grant recipients but others as well—is essential to improving outcomes. Grantees need multiple kinds of information for multiple uses. They need it to decide where to focus, find ways to improve, and make choices about which practices, products, and providers to choose and use. Moreover, grantees need to be able to access this information easily at multiple times in multiple places.

This white paper complements the *Improving Outcomes* report by examining more fully the important challenge of effective grant program communication and transparency. It argues that federal grant programs want to communicate to advance three discrete transparency objectives: improving outcomes and operational quality, strengthening accountability, and demonstrating results. It offers examples of different approaches grant programs have used in the past to make progress on these three transparency goals. It considers ways to measure whether grant program communication efforts are working as hoped and ways to make grant program communication efforts more effective. It also talks about multiple bodies of research that can help grant programs communicate more successfully and recommends that grant programs start working together to find, build, and share relevant research to make progress on their transparency objectives.

A companion white paper, *Federal Grants Management: Improving Operational Quality*, explores a third dimension of performance—operational quality—that grant programs manage to improve along with outcomes and transparency.

## What Is Grant Transparency and Why Is It Important?

In addition to managing grants to improve outcomes and operational quality, every grant program needs to be transparent. More specifically, every grant program has the opportunity and arguably the responsibility to communicate in ways that advance three distinct but complementary transparency objectives:

- Improve outcomes and operational quality
- Strengthen accountability, and more specifically, mutual, democratic, and performance accountability
- Demonstrate results

The term transparency is often used, but seldom clearly defined. Most agree that transparency is good and more transparency is better but not always or for everything. But what is transparency?

Presidents and Congress, in multiple ways and at multiple times, have weighed in on that question. In a Presidential Memorandum on Transparency and Open Government released on his first day in office, President Obama instructed the federal government to open government data to make government transparent, participatory, and collaborative,<sup>1</sup> themes subsequently reinforced in a May 2013 Executive Order:

Openness in government strengthens our democracy, promotes the delivery of efficient and effective services to the public, and contributes to economic growth. As one vital benefit of open government, making information resources easy to find, accessible, and usable can fuel entrepreneurship, innovation, and scientific discovery that improves Americans' lives and contributes significantly to job creation.<sup>2</sup>

The Trump administration talked about transparency when it set a cross-agency (CAP) goal to “Leverage data as a strategic asset to grow the economy, increase the effectiveness of the federal government, facilitate oversight, and promote transparency,”<sup>3</sup> and again in OMB Memorandum M 21-03 on “Improvements in Federal Spending Transparency for Financial Assistance.”<sup>4</sup>

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<sup>1</sup> White House (2009, January 21). “Transparency and Open Government Memorandum for the Head of Executive Departments and Agencies.” Retrieved from: <https://obamawhitehouse.archives.gov/the-press-office/transparency-and-open-government>

<sup>2</sup> White House Executive Order – Making Open and Machine Readable the New Default for Government Information (2013, May 9). Executive Order -- Making Open and Machine Readable the New Default for Government Information. Retrieved from: <https://obamawhitehouse.archives.gov/the-press-office/2013/05/09/executive-order-making-open-and-machine-readable-new-default-government->

<sup>3</sup> U.S. government Cross-Agency Priority Goal (2020). “Performance.gov Cross-Agency Priority Goal – Leveraging Data as a Strategic Asset.” Retrieved from: <https://trumpadministration.archives.performance.gov/CAP/leveragingdata/>

<sup>4</sup> U. S. Congress (201, March 29). “Open, Public, Electronic, and Necessary Government Data Act or the OPEN Government Data Act” H.R.1770 — 115th Congress. Retrieved from: <https://www.congress.gov/bill/115th-congress/house-bill/1770?q=%7B%22search%22%3A%5B%22increasing+accountability+at+VA%22%5D%7D>

<sup>4</sup> U.S. Office of Management and Budget Memorandum (2020, Nov. 12). “Improvements in Federal Spending Transparency for Financial Assistance.” M-21-03. Retrieved from: <https://www.whitehouse.gov/wp-content/uploads/2020/11/M-21-03.pdf>

Congress has weighed in on transparency many times over the years, passing the Federal Funding Accountability and Transparency Act in 2006, the Digital Accountability and Transparency Act (the DATA Act) in 2014, and the Grant Reporting Efficiency and Agreements Transparency (GREAT) Act in 2018. A 2017 bill introduced the OPEN Government Data Act, subsequently incorporated into the Foundations of Evidence-based Policymaking Act of 2019. It calls on government “to expand the government’s use and administration of data to facilitate transparency, effective governance, and innovation, and for other purposes.”<sup>4</sup> The Government Performance and Results Act Modernization Act of 2010 (GPRAMA) requires agencies to be transparent about their longer-term strategic goals and objectives, strategies, annual goals, annual past performance, reflections on which strategic objectives are making noteworthy progress and which need more attention, and evaluations used to choose goals and strategies.

GPRAMA also requires agencies to be transparent about which of their goals are near-term priority goals. In addition, it requires the federal government to adopt and manage mission-focused and management improvement cross-agency priority (CAP) goals. The law mandates that agency and cross-agency priority goals be managed using frequent (no less than quarterly) data-informed reviews plus public reporting on progress and planned next steps. For all agency and cross-agency mission-focused and management-improvement priority goals, GPRAMA also requires that a goal leader(s) or outcome broker as discussed in the *Improving Outcomes* report be named and that name shared with the public. In short, GPRAMA requires that agency and cross-agency goals—near-term priority goals as well as longer-term strategic and annual performance goals—be managed and that key management decisions and the data and other evidence used to make those decisions be transparent to the public.

In 2017, the first federal cross-agency (CAP) goal was set for grants (Grants CAP Goal). The Grants CAP Goal is titled “Results-Oriented Accountability for Grants.” This raises the question: what does “results-oriented accountability” mean? The goal statement for the Grants CAP Goal also implies a transparency objective with its use of the term “demonstrating” before “successful results”:

“Maximize the value of grant funding by applying a risk-based, data-driven framework that balances compliance requirements with demonstrating successful results for the American taxpayer.”<sup>5</sup>

The meanings of “results-oriented accountability” and “demonstrating results”—and how they relate to transparency and the issues pertaining to them that need to be wisely managed—are examined more fully in this white paper.

Every presidential administration decides and communicates its objectives. The CAP goals each presidential administration sets are one of many ways presidential administrations convey priorities. When it sets its Grants CAP Goal, the Biden-Harris administration might decide to change or tweak the way it talks about the transparency objectives of “demonstrating successful results” and “results-oriented accountability for grants.” It might even drop the Grants CAP Goal altogether because grants management is not one of the five management improvement areas for which the GPRAMA law

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<sup>5</sup> U.S. Government Cross-Agency Priority Goal (2020). “Performance.gov Cross-Agency Priority Goal – Results-Oriented Accountability for Grants,” Retrieved from: <https://trumpadministration.archives.performance.gov/CAP/grants/>

requires adoption of a CAP goal. I hope it does not drop it. I also hope that when it adopts a new Grants CAP Goal, it reconsiders the language used in the goal statement for the first Grants CAP Goal or at least revises and clarifies the terms “demonstrating successful results,” “results-oriented accountability for grants,” and other terms used in the narrative<sup>6</sup> because language matters.

The federal government has pockets of expertise on transparency to tap for its transparency improving efforts. The Millennium Challenge Corporation, for example, published a “Transparency” document in its Principles of Practice series.<sup>7</sup> That and this white paper offer starting points to help grant programs and central office and cross-agency efforts to improve outcomes think about grant program transparency objectives and how to manage and communicate effectively to make progress on them.

Transparency is not just about opening federal data to make it available to the public. It is also about communicating that information in ways that advance the sort of high-level transparency objectives stated in the presidential and congressional directives mentioned above (e.g., strengthen democracy, promote delivery of efficient and effective services to the public, and contribute to economic growth.) The remainder of this chapter explores the meaning of the three transparency objectives listed above and their implementation implications for federal grant program managers.

Grantors and grantees cannot, practically, communicate everything to everyone all the time. Effective communication must be resourced and must be strategic, audience-focused, multidirectional, and multilateral. Every grant program must think about, plan for, decide, and manage its transparency priorities, including who needs to get what information when. Grant programs must decide priority users and priority uses for their communication efforts, something they may want to do in consultation with their grantees.

Every grant program also needs to figure out how to measure progress on its transparency priorities and manage to improve them informed by data analyses and well-designed trials. In other words, grant transparency efforts need to be evidence-based.

Readers may disagree with my assertion that every grant program should manage to improve transparency along with outcomes and operational quality. They may also disagree with the three transparency objectives this white paper argues every grant program has the opportunity and responsibility to manage. I urge those who disagree to decide whether or not they think transparency is an important objective and, if not, to be clear about why it is not. I also urge those who agree generally to clarify and reach agreement with key stakeholders including budget and oversight offices about their grant program’s transparency objectives.

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<sup>6</sup> The federal government might also want to use the term “data-informed” rather than “data-driven” because factors other than data also inform goal and strategy selection.

<sup>7</sup> Heather Hanson and Catherine Marschner. “Principles into Practice,” Millennium Challenge Corporation. Retrieved from: <https://assets.mcc.gov/content/uploads/2017/05/paper-2015001163301-principles-transparency.pdf>

## Grant Transparency to Improve Outcomes and Operational Quality

Grants are purpose-driven partnerships. They are, essentially, a joint agreement between the federal government and a grant recipient to pursue progress on a specific outcome or set of outcome objectives. Making progress on outcome objectives requires not just collecting data. It also requires analyzing and continually brainstorming those data along with the findings of well-designed trials with grant recipients and other goal allies in ways that help everyone decide what roles they can play to contribute to progress. Doing this requires effective communication practices.

To help grantees and others amplify and accelerate progress on grant program outcome objectives, grant programs need to communicate the following to grantees on the front line and to those who support and conduct oversight of them as well as other current and potential goal allies:

- Grant program goals, objectives, and strategies and why all were chosen
- Performance and other useful data
- Quantitative and qualitative analyses of those data
- Research findings translated for lay practitioners about what works and what works better and how that can vary by situation
- Theories of change
- Knowledge gaps
- Knowledge-filling plans

It helps when grant programs communicate these discrete kinds of information in the context of each other rather than communicating about each on its own. For example, a grant program might link analyses of available data about the size and characteristics of a problem to a specific evaluation finding to suggest the relative import and applicability of that evaluation finding. It presumably wants to communicate lists and descriptions of known knowledge gaps and knowledge-filling plans together with information about historic trends and other accomplishments as well as the findings of relevant well-designed trials.

An Environmental Protection Agency (EPA) grant program suggests one promising approach for integrating this kind of information. When EPA posted an announcement of available funds to help tribes reduce lead in drinking water in schools, it linked the announcement<sup>8</sup> to a detailed action plan.<sup>9</sup>

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<sup>8</sup> U.S. Environmental Protection Agency (2020, July 30). "EPA Announces \$4.3 Million for Tribes to Reduce Lead in Drinking Water in Schools," News Releases from Headquarters. Retrieved from:

<https://www.epa.gov/newsreleases/epa-announces-43-million-tribes-reduce-lead-drinking-water-schools>

<sup>9</sup> U.S. Environmental Protection Agency President's Task Force on Environmental Health Risks and Safety Risks to Children (2018, December). "Federal Action Plan to Reduce Childhood Lead Exposures and Associated Health Impacts." Retrieved from: [https://www.epa.gov/sites/production/files/2018-12/documents/fedactionplan\\_lead\\_final.pdf](https://www.epa.gov/sites/production/files/2018-12/documents/fedactionplan_lead_final.pdf)

The action plan included the following graphic succinctly conveying progress made and possible government action explaining why. The action plan also described why the outcome objective is important and the four specific outcome sub-objectives EPA will be using in the future to make progress on the overarching objective of lower lead poisoning in children. Posting announcements of grant fund availability this way helps potential grant applicants and others understand what needs to be done and why in addition to helping them learn from experience.

**Figure 1: Lead Poisoning Prevention Policies Impact Mean Blood Levels among Children in the U.S., 1972-2020**

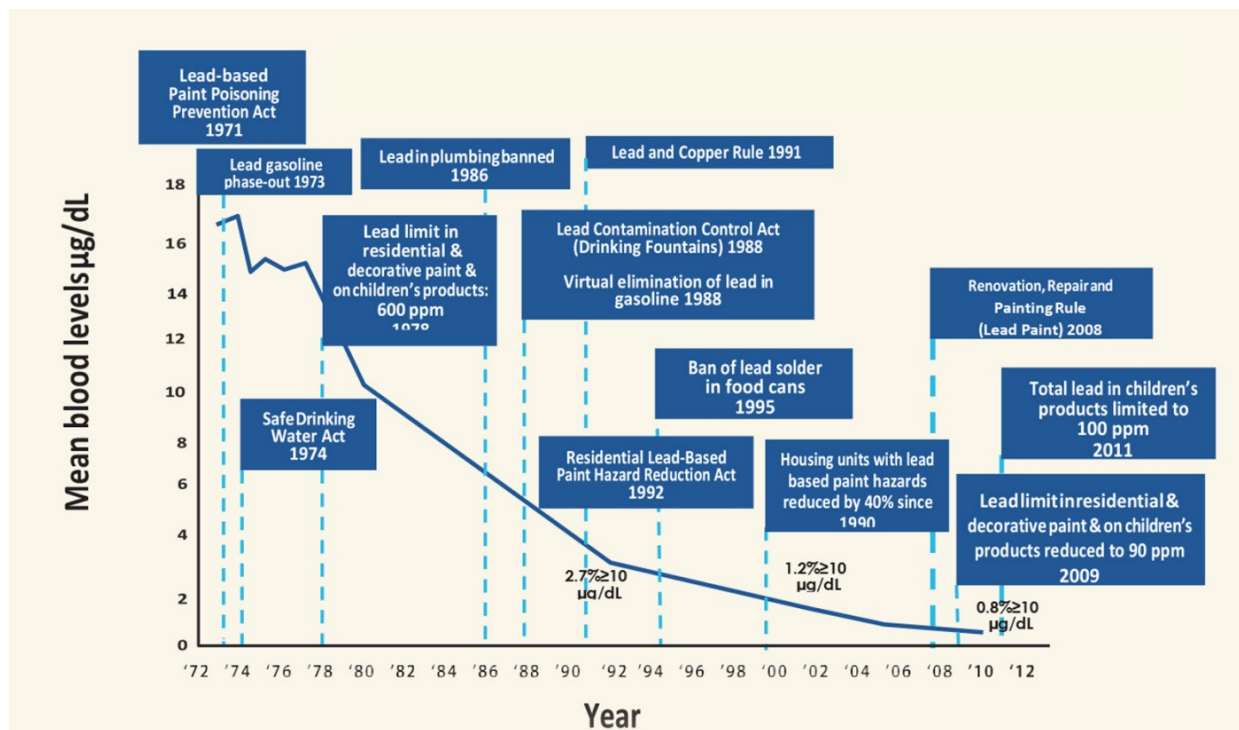


Figure 1: Source - Adapted from [https://ptfceph.niehs.nih.gov/features/assets/files/key\\_federal\\_programs\\_to\\_reduce\\_childhood\\_lead\\_exposures\\_and\\_eliminate\\_associated\\_health\\_impacts/presidents\\_508.pdf](https://ptfceph.niehs.nih.gov/features/assets/files/key_federal_programs_to_reduce_childhood_lead_exposures_and_eliminate_associated_health_impacts/presidents_508.pdf) and Brown MJ and Falk H. Toolkit for establishing laws to control the use of lead paint. Module C.iii. Conducting blood lead prevalence studies. Global Alliance to Eliminate Lead Paint (2017)

It is not always so easy to see how all the pieces related to a grant program fit together. It has not been easy for this author, for example, to find information about if, when, and how the U.S Education Department (ED) followed up on the multiple efforts that the ED funded over the years to support the search for positive outliers in K-12 schools—such as the better comparative performance growth of



Chicago,<sup>10</sup> Mississippi, and Washington, D.C.<sup>11</sup> public schools. Did ED also support efforts to identify the practices that helped those positive outlier schools outperform their demographic peers? Did it find those practices and try to replicate them to see if they produced better results in other places? Did those replication efforts work and have they been shared in a way that others could easily find? Even though I cannot find it, that kind of information may be readily available to the target audiences for this grant, presumably state school administrators, local school superintendents, school principals, teachers, and parents.

Grant programs cannot just assume, though, that their target audiences receive, understand, and are able to apply appropriately the information they communicate. They must assess if their communication efforts successfully reach priority users and if the information, once delivered, helps them improve. They also must assess whether to look for increasingly effective, cost-effective, and equitable communication approaches to help them improve.

In short, effective transparency needs to embrace an evidence-based approach. Those doing A/B testing on websites comparing two different web-presentation approaches to see which gets a stronger response from target audiences have demonstrated not just the feasibility but also the value of getting fast, detailed feedback to improve website communication practices. This A/B testing approach is increasingly being used in other aspects of grant program communications using what some call rapid-cycle evaluation to improve grant program outcomes.<sup>12</sup>

The Communications-Human Information Processing (C-HIP) model developed for the safety warnings field may offer grant programs a helpful framework for thinking about how to assess and improve their communication efforts (see Figure 2).<sup>13</sup> C-HIP suggests what grant programs can measure to assess if their communication efforts are working well or not, and the importance of thinking about communication channels. Grant programs do not need to measure progress on each step in this chart and may find some steps more feasible to measure than others. Moreover, the important question of whether a behavior change brought about changes in real-world outcomes is not addressed in the C-HIP model. Nonetheless, grant programs may find measuring progress on some or all of the steps in the CHIP model useful as intermediate outcome indicators.

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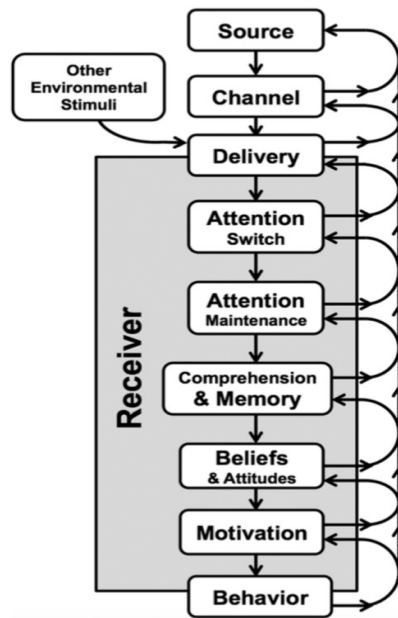
<sup>10</sup> Sean Reardon (2019). "Educational Opportunity in Early and Middle Childhood: Using Full Population Administrative Data to Study Variation by Place and Age," *The Russell Sage Foundation Journal of the Social Science* 5:2, p. 40-68. Retrieved from: <https://cepa.stanford.edu/content/educational-opportunity-early-and-middle-childhood-using-full-population-administrative-data-study-variation-place-and-age>. See, also, Emily Badger and Kevin Quealy (2017, Dec. 5). "How Effective Is Your School District? A New Measure Shows Where Students Learn the Most," *The New York Times*. Retrieved from: <https://www.nytimes.com/interactive/2017/12/05/upshot/a-better-way-to-compare-public-schools.html>

<sup>11</sup> [The] Nation's Report Card. "Data Tools: State Profiles" (2020). Retrieved from: <https://www.nationsreportcard.gov/profiles/stateprofile?chort=3&sub=MAT&sj=AL&sfj=NP&st=MN&year=2013R3>. See, also, Jill Barshay (2019, October 30). "U.S. education achievement slides backwards; Substantial decrease in reading scores among the nation's eighth graders." *The Hechinger Report*. Retrieved from: <https://hechingerreport.org/u-s-education-achievement-slides-backwards/>

<sup>12</sup> Mathematica, "Rapid-Cycle Evaluation." Retrieved from: <https://www.mathematica.org/services/research-and-evaluation/rapid-cycle-evaluation>

<sup>13</sup> Michael S. Wogalter (2019). "Communication-Human Information Processing (C-HIP) Model" in M. S. Wogalter (Ed.), *Forensic Human Factors & Ergonomics: Case Studies and Analyses*, CRC Press/Taylor & Francis Group, pp. 33-49.

**Figure 2: Communication-Human Information Processing (C-HIP) Model**



**Source:** Michael S. Wogalter (2019). "Communication-Human Information Processing (C-HIP) Model" in M. S. Wogalter (Ed.), *Forensic Human Factors & Ergonomics: Case Studies and Analyses*, CRC Press/Taylor & Francis Group.

Grant programs use multiple tools to communicate to improve outcomes. These tools include grant program goals and reporting requirements. They include evidence repositories, training and technical assistance, social marketing campaigns and shared campaign materials. They include websites and messages sent to those who sign up for listservs. They include synchronous in-person and online meetings, as well as asynchronous online discussion threads. They include financial and in-kind support for networked improvement communities and communities of practice. They include low-tech phone calls and higher tech data systems as well as the kinds of report generators that make it easier to make sense of posted data. They also include monitoring and oversight reports, which can unintentionally send a strong message to grantees about where to focus if more attention gets directed to finding problems through monitoring and oversight reviews than to identifying promising practices and helping the field validate promising practices and adopt more robustly proven ones. When grant programs use these tools, they cannot just hope they work, however. They need to assess their effectiveness, cost-effectiveness, and equity.

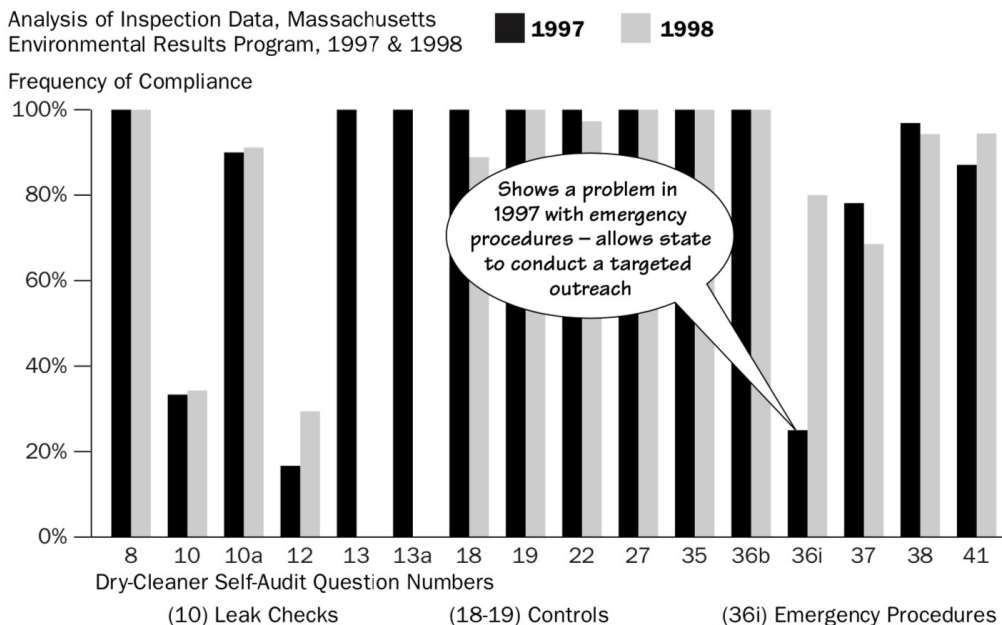
To improve outcomes and operational quality, grant programs may also want to support communication efforts that help grantees find not just the most effective and cost-effective practices and products but also those that are easier to use. The Data Design Initiative (DDI) of the National Head Start Association (NHSA) is trying one approach to that. It launched "The Junction"<sup>14</sup> to gather and share consumer feedback on products and services Head Start programs purchase. The Junction builds on lessons of other consumer review sites, including Yelp.com, Amazon.com, and Consumer Reports. The hope is that this consumer feedback platform (shared with the public but still in a very early phase of development) will complement product and practice effectiveness evaluations. Also, to encourage development of

<sup>14</sup> National Head Start Association. "The Junction." Retrieved from: <https://thejunction.nhsa.org/>

more useful products and practices than currently exist in the key area of child assessments, DDI published suggested principles for “Better, Simpler Assessments.” Building on these principles, the University of Oregon launched an effort to rate early childhood impact measurement tools on multiple dimensions of performance.<sup>15</sup> Although neither of these DDI efforts received direct federal funding, staff from the federal Office of Head Start and the Administration on Children and Families occasionally attend NHSA’s Data Design Huddles. It is not hard to imagine federal grant programs supporting this sort of consumer feedback work in the future, complementing federal efforts that encourage evaluation of practice and product effectiveness and comparative effectiveness.

If they take the time to think about when and how to communicate the information they collect, grant programs can find useful information to inform where to focus and find ways to improve in surprising places. The inspection and monitoring data many grant programs currently collect from or about their grantees, for example, can be a rich resource to harvest for useful insights but only if grant programs intelligently collect and analyze the data and communicate those analyses in a timely manner to key users. Figure 3 displays a graphic the Massachusetts Environmental Results Program generated many years ago showing two years of self-reported data from regulated parties about their adoption of compliance and beyond compliance practices explained in sector-specific workbooks for selected regulated sectors.<sup>16</sup> Note how this graphic suggests where to focus. It also suggests the effectiveness of actions taken to reduce problems found. Consider, also, how this graphic would be even more informative with additional information bubbles or an accompanying list describing each of the 41 reported practices and their relative import.

**Figure 3: Analysis of Inspection Data, Massachusetts Environmental Results Program, 1997 & 1998**



**Source:** Massachusetts Department of Environmental Protection. Reprinted from Shelley Metzenbaum (2003, March-April). “More Nutritious Beans,” *The Environmental Forum*, Environmental Law Institute.

<sup>15</sup> EC PRISM (2021). “Impact Measures Tool Launch Event,” University of Oregon Center for Translational Neuroscience. Retrieved from: <https://vimeo.com/showcase/8044139>. See also: <https://ctn.uoregon.edu/projects/impact-measuresrepository>

<sup>16</sup> Shelley Metzenbaum (2003, March-April). “More Nutritious Beans,” *The Environmental Forum*, Environmental Law Institute.

Many grant programs could use this simple analytic and visualization approach to reap more value from the compliance and monitoring data they collect and share those insights so everyone can make better decisions about where to focus and sense whether the actions they are taking are working as well as expected. A companion white paper on *Federal Grants Management: Improving Operational Quality* shares another example of how the Federal Emergency Management Agency (FEMA) has made noteworthy progress analyzing and visualizing monitoring, audit, and compliance data to point to problem areas needing management attention in order to reduce those problems.

Too often, grant programs gather monitoring and other oversight information in a way that does not make it easy to use the information to find opportunities for improvement. Head Start monitoring reports, for example, are extremely hard to find and, when found, hard to analyze. The Office of Head Start (OHS) monitors every Head Start program in multiple ways. It conducts what are called CLASS (Classroom Assessment Scoring System) observations at least once every five years to determine which programs need to re compete to retain their grants. It also uses a contractor to monitor every program in two focus areas at least once every three years. CLASS data have been released in a way that made it possible for a policy organization to undertake a search for exemplar programs and their exemplar practices, as discussed in the *Improving Outcomes* report. The other monitoring findings have not been communicated that way, unfortunately. Each monitoring report is posted as an image (PDF) online, although it is surprisingly hard to find these reports. They are not posted in machine-readable form nor in an analyzable data base the public can access. OHS does analyze monitoring data every year to look for problems and report on them to Congress,<sup>17</sup> and this attention to problem reduction seems to be working well. Problems have declined over time, are small in number, and quickly resolved. OHS does not, however, conduct a similar analysis of bright spot practices that might be worth trying to replicate although several promising developments have recently occurred. OHS recently asked monitors to include in their monitoring reports narrative descriptions of “Program Highlights,” and some monitors started to categorize those highlights just as problems are categorized. Also, OHS has indicated an interest in working with NHSA, the grantees’ network, to find ways to share and analyze monitors’ findings to make it easier to harvest more improvement-oriented insights from their observations.

In some cases, grant programs may intentionally choose to make information such as monitoring data hard to find to prevent that information from being used unfairly to embarrass grantees working hard and intelligently to improve. Grant programs need to work with grant recipients to think not just about which measurements to share with whom, but also which not to share with different audiences for different situations. They also need to think about allowed and unallowed as well as encouraged and discouraged uses of collected and shared data and incorporate decisions about data sharing in law, policy, and data sharing agreements.

New technologies make information communication to support continuous learning and improvement more feasible and affordable than ever. So do advances in visualization techniques that are being used

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<sup>17</sup> U.S. Department of Health and Human Services Administration for Children and Families Office of Head Start (FY2017). “Report to Congress on Head Start Monitoring.” Retrieved from: <https://eclkc.ohs.acf.hhs.gov/sites/default/files/pdf/fy-2017-head-start-monitoring-report.pdf>

to translate numbers to pictures, maps, and animations<sup>18</sup> in ways that make the information more understandable, relevant, and eye-catching to more people.

Technology alone is not enough, however, for communicating effectively to improve outcomes and operational quality. As GAO reported in its review of the implementation of the American Recovery and Reinvestment Act of 2009 (Recovery Act), active management of transparency and communication was key to the highly successful implementation of the law:

OMB sought to facilitate effective implementation of the Recovery Act by working to establish and **strengthen relationships** with state and local governments that would ultimately implement the programs on the ground. This was done in two ways: (1) by **soliciting feedback** from state and local partners when formulating and revising rules and policies governing the implementation of Recovery Act programs and (2) by developing its **capacity to respond to questions** from the many states and localities that would be implementing those rules and policies. . . . Starting in the spring of 2009, regular participants in these [weekly] calls included OMB; GAO; the National Association of State Auditors, Comptrollers and Treasurers; the National Governors' Association; the National Association of State Budget Officers; the Recovery Board; the National Association of Counties; the National Association of State Chief Information Officers; and the National Association of State Purchasing Officers . . .

. . . OMB worked with the [oversight] Recovery Board to establish an **assistance center** based on an **"incident command"** model. . . . According to OMB officials, from September to mid-December of 2009, the center responded to approximately 35,000 questions from states and localities.<sup>19</sup>

Effective communication to improve outcomes and operational quality needs to be frequent. It needs to be back-and-forth and inclusive—providing fast feedback while also informing longer-term strategic thinking. It needs to support brainstorming across grantees, continuous learning from analyzed data and tested theories of change, and appropriate application of knowledge from the field and the lab.

The Recovery Act was exceptional in some ways because of the vice president's leadership role. In truth, though, as discussed in the report, *Improving Outcomes*, every grant program needs an outcome broker—an appointed or career leader charged with coordinating progress on grant program outcome objectives, including communicating successfully and continually with those involved in improving outcomes. That same outcome broker also needs to pay attention to operational quality. The implementation practices of the Recovery Act simply demonstrated the value of this approach applied to grants management, especially when cross-agency action is needed.

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<sup>18</sup> See, for example, Hans Rosling (2009, June). "Let My Dataset Change Your Mindset," TED talk. Retrieved from: [https://www.ted.com/talks/hans\\_rosling\\_let\\_my\\_dataset\\_change\\_your\\_mindset?language=en](https://www.ted.com/talks/hans_rosling_let_my_dataset_change_your_mindset?language=en)

<sup>19</sup> U.S. Government Accountability Office (2014, January). "Recovery Act: Grant Implementation Experiences Offer Lessons for Accountability and Transparency." Retrieved from: <https://www.gao.gov/assets/670/660353.pdf>

## Grant Transparency to Strengthen Accountability

Grant programs also need to communicate to strengthen accountability. More specifically, they need to communicate to strengthen mutual accountability, democratic accountability, and performance accountability.

Accountability, too, is a term often used but seldom defined. Harvard performance expert Robert Behn quips that most people in government think of accountability as blame-laying:

I suspect, however, that the people being held accountable know [what accountability means]. These accountability holdees have a very clear picture of what being held accountable means to them—to them personally. They recognize that, if someone is holding them accountable two things can happen: When they do something good, nothing happens. But when they screw up all hell can break loose.<sup>20</sup>

Behn suggests that for many in government, talk of accountability feels threatening and unfair, especially when those being held accountable don't know that for which what they are accountable. An EPA program manager observed in a 2000 study by the National Academy of Public Administration about the Government Performance and Results Act (GPRA) and the National Environmental Performance Partnership System (NEPPS) and Performance Partnership Grants (PPG) that the lack of clarity about accountability expectations was causing problems:

EPA and Congress need to decide whether to use GPRA as “a management or an accounting tool” because “if GPRA is an accounting tool, the PPG process makes it inherently inaccurate and troublesome when applied to state grants.” On the other hand, “if it is a management tool, then PPG flexibility is not such a big issue and [EPA can use] after-the-fact program auditing and multiyear trends to show how state programs are performing from a management perspective” as the original NEPPS agreement intended.<sup>21</sup>

What is interesting is that by making a distinction between fiscal accountability and management, this seasoned EPA manager is suggesting that oversight for the two may be in conflict. The changes made to GPRA law in 2010 were intended to send the message that management for outcome improvement is what matters most.

Unfortunately, accountability is seldom clearly defined to indicate who is accountable to whom for what and in which situations.<sup>22</sup> To avoid the unfairness about which Behn writes and to avoid getting captured in a compliance mindset that overwhelms attention to improving outcomes, grant programs need to reach out to their Congressional authorizers and appropriators, as well as their management, budget shop, OMB, and other entities to try to reach agreement on that for which they will be held accountable.

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<sup>20</sup> Robert Behn (2001). *Rethinking Democratic Accountability*, Brookings, p.3.

<sup>21</sup> Lee Paddock and Suellen Keiner (2000). “Mixing Management Metaphors: The Complexities of Introducing a Performance-Based State/EPA Partnership System in an Activity Based Management Culture,” Research Paper Number 11 in *Environment.gov Volume III*, DeWitt John, project director, National Academy of Public Administration, p. 11.48.

<sup>22</sup> Shelley H. Metzenbaum (forthcoming). “Accountability: What Does It Mean, Constructively Managing It, and Avoiding the Blame and Claim Game” in Marc Holzer and Andrew Ballard, ed., *The Public Productivity and Performance Handbook*, 3<sup>rd</sup> edition, Routledge.

Just as important, they need to talk with their grant recipients about accountability expectations. This section argues that federal government grant programs need to communicate well to strengthen three distinct kinds of accountability:

- Mutual accountability between grantors and grant recipients
- Democratic accountability
- Performance accountability

### **Strengthening Mutual Accountability**

Mutual accountability means grant programs and grant recipients, and perhaps other goal allies, sorting out who will do what (including what grantors will do for grantees) and when they will do it to make progress on grant program objectives. It is also about delivering on those expectations in trusted and respectful ways, allowing for adjustments in prior commitments when needed.

Grant programs hold grant recipients accountable for many things and use many means to communicate those accountability expectations. They specify the kinds of information grant applicants need to communicate before getting a grant (e.g., needs assessments, goals and plans, local funding commitments) and after receiving a grant as a condition of grant funding (e.g., required practices, reporting requirements). In addition, what auditors and monitors pay attention to communicates federal government accountability expectations to grant recipients. Too often, unfortunately, current post-award practices of many grant programs communicate greater interest in avoiding all problems and compliance than in finding and promoting ways to improve outcomes and operational quality. Grant programs need to make sure the messages they send with their pre- and post-award activities support efforts to figure out where to focus and how to improve outcomes and operational quality.

Grant recipients are clearly accountable to grant programs. Grant programs, in turn, need to be accountable to grantees. Arguably, grant programs should be accountable to their grant recipients for:

- Building and sharing knowledge that helps grantees learn from their own and others' experience how to improve and that informs grant recipient priority-setting. In addition, grant programs need to return data from and about grant recipients with value added through analyses that help grantees make better decisions.
- Courteous, fair, streamlined, and helpful processes, including insight-generating oversight.
- Central office and collective actions to realize economies of scale and other synergies that individual grantees acting on their own cannot realize.

These mutual accountability expectations should not be assumed. They should be discussed and agreed upon. FEMA, for example, decided to co-locate its offices with state emergency offices to improve its communication and coordination with its grant recipients and others at the local level key. A long-time EPA regional office leader believes that annual discussions between the state and EPA about each state's annual Performance Partnership Agreement creates a constructive cadence for sorting out issues and

mutual accountability expectations in addition to sorting out state and national priorities for the coming year.

Mutual accountability calls for grantors and grantees to take time periodically (at sufficient frequency appropriate to the situation) to sort out the goals and roles of each party working on shared objectives. An annual performance partnership planning meeting can be a good way to sort out priorities as well as roles and responsibilities, especially if those meetings are informed by a look-back at prior year goals, what got accomplished, what got adjusted, why, and lessons from other locations. In principle, grant programs could use discussions and negotiations about grant agreements as the time to clarify mutual accountability expectations. They either need to use them that way or arrange another time to have these kinds of discussions.

Grant programs need to be accountable to grantees for communicating positive outlier and other information that helps grant recipients find ways to improve. They need to be accountable for communicating with grantees early and often to set and frame goals in useful ways, to generate and share useful data and analyses that help grant recipients and others find ways to improve, and to share information about increasingly and comparatively more effective and cost-effective strategies and practices in ways that successfully encourage their adoption. Grant programs need to be accountable for returning data they collect from grantees back to them with value added through analyses, for providing curated relevant research findings, and for confirming that grantees not only know about but can easily and affordably access, understand, and appropriately apply the analyses and research findings shared. Grant programs should be accountable for communicating the above information in timely, easily found ways. They also need to be accountable for respectful, courteous, and well-functioning grant application, fund flow, and reporting processes.

Grant program accountability is not just about sharing evidence, though. It is also about establishing effective listening mechanisms to hear about possible problems and opportunities, validate and prioritize them, and take action. In addition, it is about supporting networks, events, and online platforms that help grantees communicate better to learn from and collaborate with each other and sometimes with those with stronger analytic and research capacity. Finally, grant program accountability to grant recipients should include communication to identify, prioritize, and execute on the delivery of synergistic products and service that the federal government or groups of grantees are likely to be able to do more successfully than individual grant recipients can acting on their own.

The importance of not just clarifying but also communicating about accountability expectations cannot be overstated. Say, for example, a grant recipient has good reason to believe that current compliance requirements are misdirected or should be treated as a lower priority than other activities. Mutual accountability meetings are needed to sort these matters out. At the same time, it is important, arguably essential, to bring monitoring, auditors, and other oversight entities into this conversation lest they audit for something other than agreed upon accountability expectations, especially if flexibilities are afforded to allow innovation to find and implement better practices.



## Strengthening Democratic Accountability

Democratic accountability is about inviting people and their elected representatives to weigh in through democratic processes on grant program goals, measurements, strategies, and resource allocation and possibly on analytic and research methods. These need to be communicated in ways that are fair, known, understandable, readily findable, and easily accessed. They need to be communicated in ways that build understanding of different perspectives, resolve confusion, and respect and pay attention to different views.

Communicating about these matters to strengthen democracy is not a new idea. GPRAMA requires every federal department to consider the “views and suggestions of those entities potentially affected by or interested” when setting grant goals and strategies for departmental strategic plans. It also requires “an identification of those key factors external to the agency and beyond its control that could significantly affect the achievement of the general goals and objectives” and “a description of the program evaluations used in establishing or revising general goals and objectives, with a schedule for future program evaluations to be conducted.”<sup>23</sup> GPRAMA requires these democratic accountability practices of all federal departments. Grant programs can embrace them to improve democratic accountability, finding ways to engage Congress and the public in healthy democratic debate and decision making about grant program goals, measurement, analyses, strategies, and, sometimes, tactics.

To strengthen democratic accountability, grant programs can invite the public to engage in constructive consideration of program goals and why they were chosen; beneficiaries and the rationale behind targeting decision if any were made; the “what, when, usage, and sharing” of measurement and analyses; and strategies and why they were selected. I am guessing that some readers are now saying to themselves, “Are you kidding? Enough already!” The reality, though, is that grant programs have long operated surrounded by and sometimes influencing these debates, as the following examples illustrate:

**Goals.** Grant goals can and do change, reflecting lessons learned and different political preferences.

When Congress reauthorized and revamped the K-12 education law, it changed the name from “No Child Left Behind” (NCLB) to “Every Student Succeeds” Act (ESSA), signaling a slight shift in grant program goals. It also adopted a more significant change to the structure of the incentive system. President Obama reflected on the importance of paying attention both to program goals and the implementation strategies used to advance them when he signed the ESSA law, “The goals of No Child Left Behind, the predecessor of this law, were the right ones. High standards. Accountability. Closing the achievement gap. But in practice, it often fell short. It didn't always consider the specific needs of each community. It led to too much testing during classroom time. It often forced schools and school districts into cookie-cutter reforms that didn't always produce the kinds of results that we wanted to see.”<sup>24</sup>

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<sup>23</sup> U.S. Congress (2011, January). “Government Performance and Results Act Modernization Act of 2010.” P.L. 111-352, Section 2. Retrieved from: <https://www.congress.gov/111/plaws/publ352/PLAW-111publ352.pdf>

<sup>24</sup> Gregory Korte (2015, December 10). “The Every Student Succeeds Act vs. No Child Left Behind: What's changed?” *USA Today*. Retrieved from: <https://www.usatoday.com/story/news/politics/2015/12/10/every-student-succeeds-act-vs-no-child-leftbehind-whats-changed/77088780/>

**Goals, measurement, and incentives.** Goals and measurements, as well as the incentive structures linked to them, often change in response to democratic debate as well as, one hopes, to lessons learned about what was previously tried that did not work as well as hoped.

Congress adopted a different approach to measurement and its uses when it passed the ESSA. It linked rewards and punishments to the generation, analysis, and use of measurements, eliminating NCLB's automatically triggered penalties for failure to meet a goal or for the poor performance of particular groups. It also eliminated the Adequate Yearly Progress (AYP) and 100 percent proficiency goals. Instead, ESSA expects states to establish their own goals and milestones. States must use data from their accountability systems (both academic and nonacademic components) to identify schools "in need of improvement" at least once every three years (including the lowest-performing five percent, schools where one or more subgroups are underperforming, or high schools with graduation rates of less than 67 percent.) ESSA also requires districts to develop and implement evidence-based strategies—with the involvement of parents and educators—to help schools identified as being in need of improvement and identify inequitable distribution of resources. States are expected to intervene with more rigorous improvement actions if low-performing schools fail to meet state improvement criteria within four years.<sup>25</sup>

**What to measure.** In addition to debates about goals and incentives structures, democratic debate about what to measure often evolves in multiple policy fields.

The federal government started collecting crime statistics from state, local, tribal, and federal law enforcement agencies in 1930,<sup>26</sup> a program initiated by the front line, the International Association of Chiefs of Police. In 1930, the FBI was tasked with collecting, publishing, and archiving those statistics.<sup>27</sup> A 1994 law<sup>28</sup> added a requirement that the federal government collect police use of force as well as crime data. After a number of high-profile law enforcement use-of-force cases and informed by an Advisory Policy Board convened in 2015, the FBI launched a new voluntary data collection effort about fatal and nonfatal officer-involved shootings. The first nationwide data collection using this new system began in January 2019.<sup>29</sup> In June 2020, following several troubling incidents, President Trump issued an Executive Order on "Safe Policing for Safe Communities" calling for the creation of a database to track police officers with multiple instances of misconduct and "regularly and periodically make[ing] available to the public aggregated and anonymized data from the database . . . as consistent with applicable

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<sup>25</sup> ASCD (2016, May 11). "ESSA and Accountability Frequently Asked Questions"

Retrieved from: [https://www.ascd.org/ASCD/pdf/siteASCD/policy/ESSA-Accountability-FAQ\\_May112016.pdf](https://www.ascd.org/ASCD/pdf/siteASCD/policy/ESSA-Accountability-FAQ_May112016.pdf)

<sup>26</sup> U.S. Federal Bureau of Investigation, "About the Crime Data Explorer." Retrieved from: <https://crime-data-explorer.fr.cloud.gov/about#faq>

<sup>27</sup> U.S. Federal Bureau of Investigation. "Uniform Crime Reporting." Services. Retrieved from: <https://www.fbi.gov/services/cjis/ucr/>

<sup>28</sup> U.S. Congress (1994, September 13). "Violent Crime Control and Law Enforcement Act," P.L. 103-322. Retrieved from: <https://www.congress.gov/103/statute/STATUTE-108/STATUTE-108-Pg1796.pdf>

<sup>29</sup> U.S. Federal Bureau of Investigation. "National Use-of-Force Data Collection," Services. Retrieved from: <https://www.fbi.gov/services/cjis/ucr/use-of-force>

law.<sup>30</sup> Soon thereafter, the U.S. House of Representatives passed and sent to the Senate a bill requiring a more granular approach to collecting and sharing use-of-force and additional data about police activity, while making submission of data a grant condition and no longer voluntary. At the same time, the House bill limits release of data identifying a law enforcement agent, complainant, or any other individual involved in any activity for which data is collected and compiled to the public.<sup>31</sup>

The U.S. Department of Health and Human Services has similarly faced (and continues to face) debate on what is measured and how those measurements are used. For example, the Centers for Medicare and Medicaid Services (CMS) included a question about hospital pain management in the patient satisfaction survey launched in 2006. CMS used the data to calculate hospital ratings and comparative rankings. It added the pain question to the survey to address a growing consensus at the time that doctors should treat pain as the “fifth vital sign.” Some subsequently argued that this CMS decision to include a measurement of patient perception of pain contributed to higher-than-appropriate hospital prescription of opioids. In response to comments from doctors, CMS no longer looks at hospitals’ pain management scores from patient satisfaction surveys when making Medicare and Medicaid reimbursement decisions. The debate, however, continues. Some worry that the pendulum has swung back too far.<sup>32</sup>

In short, democratic debate about the goals, measurement, analyses, strategies, data publication, and data sharing practices of grant programs as well as the funding associated with them takes place continually in Congress and elsewhere. Grant programs face the challenge of figuring out how to support, learn from, and not get consumed by those debates and at the same time learn from their own experience and that of other grant programs how to inform that debate constructively. They need to communicate in ways that provide context that explains why a goal and the ambitiousness of specific targets make sense, possibly evolving to use animated historic trend and peer benchmarking data as Hans Rosling’s GapMinder system does.<sup>33</sup> They can also inform debate by showing information about a problem as well as trends in the context of actions taken to influence them, as the cross-agency program to reduce lead levels in children has done.

To inform funding decisions, grant programs can communicate information about outcome trends and accomplishments together with information about funding trends and changes in the nature of the problem or opportunity, including changes in demand and supply. How does FEMA’s funding trend for operations as well as response, for example, compare to trends in the number and severity of the extreme weather and fire events it works to prevent and to which it responds? Grant programs also

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<sup>30</sup> Donald J. Trump (2020, June 16). “Executive Order on Safe Policing for Safe Communities.” Retrieved from: <https://www.federalregister.gov/documents/2020/06/19/2020-13449/safe-policing-for-safe-communities>. See also, Tom Jackman (2020, June 17). “FBI launched database on police use of force last year, but only 40 percent of police participated,” *Washington Post*. Retrieved from: <https://www.washingtonpost.com/crime-law/2020/06/17/fbi-launched-database-police-use-force-last-year-only-40-percent-police-participated/>

<sup>31</sup> U. S. House of Representatives (2020). “George Floyd Justice in Policing Act of 2020.” Retrieved from: <https://www.congress.gov/congressional-report/116th-congress/house-report/434>

<sup>32</sup> Sonya Collings (2018, March 14). “Opioids: A Crisis Decades In the Making,” *WebMD*. Retrieved from: <https://www.webmd.com/special-reports/opioids-pain/20180314/opioids-pain>

<sup>33</sup> See FN 17.

need to communicate information about the situations in which they operate<sup>34</sup> in ways that explain program design choices and why alternative approaches were not chosen.

### **Strengthening Performance Accountability**

A 2006 GAO report defined performance accountability for grants as “the mechanisms by which individuals or organizations are held accountable for meeting specified performance-related expectations.”<sup>33</sup> GAO went on to say, “In this report, we have focused on specific mechanisms that are meant to encourage performance incentives—such as rewards given or penalties imposed—when performance exceeds or fails to meet specified levels.”<sup>35</sup>

Experience and evidence suggest that the approach to accountability recommended in the 2006 GAO report (and one many instinctually embrace) rarely works well and often backfires. Evidence and experience suggest, instead, that grant programs approach performance accountability in a different way. Grant program performance accountability should, instead, be about grant programs clearly and understandably communicating:

- Outcomes-focused goals (with a few ambitious goals set in priority areas) as well as operational quality objectives, explaining why they were chosen
- Strategies, explaining why they were chosen
- Progress, problems, and lessons learned about the reasons for both
- Planned next steps and why they were chosen

Performance accountability is about more than communicating these matters, of course. It is also about acting on this information to improve, continually, on outcome and operational quality objectives.

Government programs that have embraced these performance accountability practices in the past have not only realized (and been able to communicate) greater performance gains. They have also experienced more balanced public response to their efforts when goals are missed or things go wrong provided actions were taken based on available knowledge that seemed sensible at the time those actions were taken and the action plans and reasoning behind them communicated.

This approach to performance accountability—which relies heavily on effectively communicating with key parties interested in accountability—avoids the unfairness of the accountability approach about which Behn warns. It also reduces the likelihood of encouraging a compliance mindset, triggering dysfunctional responses, and discouraging those already motivated. In addition, it avoids the problems encountered by the Bush administration’s Program Assessment Rating Tool (PART), which

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<sup>34</sup> See, for example, U.S. State Department “Program Design and Performance Management Toolkit.” Retrieved from: <https://www.state.gov/wp-content/uploads/2018/12/Program-Design-and-Performance-Management-Toolkit.pdf>

<sup>33</sup> U.S. Government Accountability Office (2006, September) “Grants Management: Enhancing Performance Accountability Provisions Could Lead to Better Results,” GAO 06-1046, p. 1. Retrieved from: <https://www.gao.gov/products/gao-06-1046>

<sup>35</sup> GAO 06-1046, p. 2.

unintentionally shifted attention and agency effort from improving outcomes to getting a good PART score. This happened even though the rubric used to score grant and other programs asked good questions to ferret out the kinds of information suggested above. The problem was that PART communicated the program information in a way that brought more attention to the scores than to the answers to the questions.

It helps if Congressional authorizers and appropriators, as well as agency management, budget shops, OMB, and other monitoring and oversight entities embrace and communicate their acceptance of this definition of accountability and adjust their practices accordingly. That is not to be naive that elected officials and those campaigning for their seats will want to issue press releases praising the progress government programs have made. Such announcements seldom attract media attention or votes. It might be reasonable to hope, however, that those in office and campaigning might direct their attacks to where they should more appropriately be directed—at government programs not being accountable for managing and communicating outcomes and operational quality improvements as recommended in this white paper.

The Obama administration celebrated agencies that missed stretch targets as enthusiastically as it celebrated those that met them provided agencies missing their targets managed wisely using available evidence while also generating new evidence when needed to find ways to do better. It set forth in guidance that agencies meeting all of their targets for all of their priority goals would be questioned and challenged to set more ambitious targets. It reinforced this approach to performance accountability by the way it conducted the strategic reviews GPRAMA required—looking for areas with noteworthy progress as well as those needing attention in a way designed to focus attention on improvement and not on embarrassing agencies wisely managing progress on their outcome and operational quality objectives. Transparency about all of these moving parts makes this approach to performance accountability work.

## Grant Transparency to Demonstrate Results

As noted earlier, the nation's first ever cross-agency priority goal on grants adopted as its primary aim "demonstrating successful results."

"Maximize the value of grant funding by applying a risk-based, data-driven framework that balances compliance requirements with demonstrating successful results for the American taxpayer."<sup>36</sup>

What does "demonstrating successful results" mean? Does it mean meeting all targets? Does it mean all objectives that are supposed to trend in one direction or the other always move in the right direction? Or does it mean something else? The "Opportunity" section of the first Grants CAP Goal on Performance.gov suggested "demonstrating successful results" was about holding "recipients accountable for good performance practices that support the achievement of program goals and objectives." Its emphasis on "good performance practices," not on achieving results, is promising. But it does not say what good performance *practices* means. Does it mean adoption of the practices recommended in the performance accountability discussion of this white paper? I hope so. I also hope that those good performance practices get more clearly and prominently communicated.

Let me suggest that the goal of "demonstrating successful results" be reframed as "demonstrating results" or "communicating results" and that every grant program be expected to communicate clearly about its past progress, past problems, and what it knows about the reasons for both as best it can in addition to managing progress on grant program outcome objectives as discussed in the report *Federal Grants Management: Improving Outcomes*. The graphic showing trends in the level of lead in children together with dates of key government actions at the beginning of this white paper illustrates one way to tell that story. Of course, other things may partially or wholly explain the declining levels of lead in children's blood in this period. Complementing this lead graph of trends in the United States and dates of key government actions with another graph showing international current and trend comparisons of lead levels in children's blood would be even more informative.<sup>37</sup>

Today, the federal government makes it easy to find information about grant spending and grant fund availability. It does not, however, make it easy for the interested public to find and understand the why, how, and how well of grants individual or collectively. Grant programs need to do a better job telling their story and making that story easy for the public to find not only for accountability reasons and informing improvement efforts but, also and just as important, for helping the public understand the role the federal government plays in their lives and the federal government's use of their tax dollars. Grant program managers can also encourage and help their grantees communicate about their trends and discrete accomplishments.

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<sup>36</sup> See FN 5.

<sup>37</sup> Mona Hanna-Attisha (2008). *What the Eyes Don't See*. (One World). This book, about drinking water quality problems in Flint, Michigan, tells how very different lead policies in other countries have resulted in very different levels of lead in children across countries.

Promising precedents suggest possible approaches grant programs can use to demonstrate results:

One promising approach for telling the grant story is the Grants Impact and Story Tool (GIST) tool shared at a Grants CAP Goal Innovation Exchange Session and developed as part of The Opportunity Project run by the U.S. Census department. GIST, developed by a private company working with three federal grant programs, suggests one way to tell the story of a grant program coherently.<sup>38</sup>

The Centers for Disease Control's (CDC) "Winnable Battles" effort suggests another approach grant programs could use to tell the grant story although information identifying each grant program contributing to each winnable battle would need to be added to show how grants contributed to the battle.<sup>39</sup> CDC's "investment maps" also suggest a promising way to show how federal government grant funding contributed to progress on each winnable battle in each state.<sup>40</sup>

Adding information about contributing grants to outcomes-focused sites such as EPA's air trend site<sup>41</sup> and HealthyPeople.gov could make it much easier for grant programs to show how they contribute to outcome improvements.

For several years, the U.S. Department of the Interior included spark lines for every strategic objective in its annual performance report, displaying trends in both performance and spending.<sup>42</sup> EPA improved upon Interior's efforts in its FY2021 Annual Performance Plan and Congressional Justification of Appropriations when it showed spark lines for every strategic objective and made it easy to see trends moving in the right direction and those not, accompanied by nearby narrative, data tables, and more detailed trends lines that make more clear what is working well, what is not, and challenges.<sup>43</sup> EPA's annual performance report did not show funding sources wholly or partially contributing to each strategic objective, though, including grant funding sources. Adding that information would better tell its grant story.

For years, grant-funded construction sites have prominently displayed signs indicating that federal funds contributed to what was being built. It is not hard to imagine a grant program using an online map to show all projects the grant and its predecessors funded in the past as well as those currently underway, together with before-and-after pictures and narrative about the benefits of the grant-funded projects.

R&D programs might want to experiment with genealogy charts to show not just the discrete projects funded but their "offspring" and descendants.

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<sup>38</sup> Rujuta Wankar (2019, June 27). "What's the GIST of your grant programs?" Retrieved from:

<https://trumpadministration.archives.performance.gov/CAP/innovation-sessions/6-27-the-opportunity-project.pdf>

<sup>39</sup> United States Centers for Disease Control. "CDC Winnable Battles." Retrieved from:

<https://www.cdc.gov/winnablebattles/index.html>

<sup>40</sup> United States Centers for Disease Control. "Investing to Protect the U.S. and World against AR." Retrieved from:

<https://arinvestments.cdc.gov/>

<sup>41</sup> U.S. Environmental Protection Agency. "National Air Quality: Status and Trends of Key Air Pollutants." Retrieved from:

<https://www.epa.gov/air-trends>

<sup>42</sup> U.S. Department of the Interior (2017, May 26). 2017/2018 Annual Performance Plan & 2016 Report (APP&R). Retrieved from: [https://www.doi.gov/sites/doi.gov/files/uploads/doi\\_appr\\_05262017\\_final.pdf](https://www.doi.gov/sites/doi.gov/files/uploads/doi_appr_05262017_final.pdf)

<sup>43</sup> U.S. Environmental Protection Agency (2020, February). "FY 2021 Justification of Appropriation Estimates for the Committee on Appropriations, Tab 13: Program and Performance Assessment. EPA-190-S-20-00. p. 700-701.

<https://www.epa.gov/sites/production/files/2020-03/documents/fy21-cj-13-program-performance.pdf>

Current efforts to tell the grant story to the public and their why, what, and how is often fragmented even though beta.SAM.gov provides a field where every grant program can describe its accomplishments as well as a field for its objectives. When accomplishment information does exist, it is often confusing, complicated, or hard to find. Grant programs, their parent agencies, and the federal government need to improve their transparency practices to demonstrate results in order to strengthen public trust in government.



## Recommendations

### Grant Program Leaders and Outcome Brokers

#### To improve transparency to improve outcomes

- **Assign and resource.** Assign staff to communicate coherently to the public and grant recipients the why, how, and how well of each federal grant program and explain how each grant program contributes to specific outcome objectives. Build on and learn from work already done such as HealthyPeople.gov and Department of Transportation's (DOT) transportation safety hub.<sup>44</sup> Resource this work adequately.
- **Link.** Include in announcements of grant program funding availability links to relevant action plans explaining why the outcome objective is important, progress made, problems encountered, lessons learned, and other relevant research as well as plans for future action. Link to evidence repositories, data sources, and data analytics likely to be useful to grant applicants and recipients trying to decide where to focus and looking for ways to improve on grant program outcome objectives. Link to and with relevant learning agendas as those get developed as required by the Foundations of Evidence-based Policymaking Act.
- **Network.** Connect grant recipients with data analysts and other researchers as well as with each other to find ways to make progress on the grant program's outcome objectives.
- **Prioritize and Assess.** Working with grant recipients and others, identify priority users of grant program outcome and other information, as well as their priority uses. Assess the effectiveness, cost effectiveness, and equity of outcomes-improving transparency practices.
- **Discuss and decide.** Working with grant recipients and others, identify grant outcome-improving transparency problems. Then, prioritize and problem-solve them.

#### To improve transparency to improve operational quality, communicate to:

- **Prioritize and problem-solve.** Meet periodically with grant recipients to identify service quality problems that need attention and address them successfully.
- **Measure.** Identify, collect, and manage using key performance indicators (KPIs) for service quality, working with grant recipients where appropriate to decide sensible KPIs.

#### To improve transparency to strengthen mutual accountability, communicate to:

- **Clarify.** Communicate coherently to grant recipients about outcome and other objectives, strategies, and why they were chosen.

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<sup>44</sup> U.S. Department of Transportation. "Safety and Health." <https://www.transportation.gov/policy/transportation-policy/safety>

- **Discuss.** Discuss outcome and operational quality objectives and sub-objectives, strategies to advance them, data to collect and other information sources to use, past data analyses and study findings, knowledge gaps, and knowledge-filling priorities as well as who could do what when to support progress on shared outcome objectives.
- **Agree.** Sort out not just grantor and grantee goals, strategies, measurement, and evidence-building and sharing methods but also who will do what long and short term, adjusting as knowledge is gained and the world changes. Establish routines to discuss and review progress and sort out who will do what next to support outcome and operational quality improvement.

**To improve transparency to strengthen democratic accountability,** communicate to:

- **Inform debate.** Communicate in ways that inform and support democratic debate about goals, indicators, strategies, and planned next steps.
- **Explain.** Tell the grant story coherently throughout and after the grant lifecycle to help policy makers and the public engaged in democratic debate about program objectives and means understand what the federal government and local grant recipients are doing, why, how, and how well.

**To improve transparency to strengthen performance accountability,** communicate to:

- **Improve outcomes.** Clearly and understandably communicate outcomes-focused goals and priority goals, strategies, progress, problems, reasons for progress and problems, and planned next steps. Explain why goals, strategies, and planned next steps were chosen.
- **Act informed by evidence.** Act intelligently informed by data analyses and the findings of well-designed trials to improve, continually, on outcome and other objectives, working closely with and supporting grant recipients and other goal allies in this effort.
- **Motivate in evidence-informed ways.** Structure incentives and other motivational mechanisms in ways that evidence and experience suggest will encourage continuous improvement and discrete accomplishments, as appropriate, while avoiding incentives likely to tempt measurement manipulation and the adoption of timid targets.
- **Conduct constructive oversight that generates useful insights.** Conduct grant program oversight and monitoring in ways that encourage grantees to use and produce data to inform where to focus, learn from and participate in well-designed trials, and continually look for and adopt better practices. Simultaneously, encourage grant program oversight entities to take a similar approach when conducting oversight of grant programs and grantees.

**To improve transparency to demonstrate results,** communicate to:

- **Tell the grant story coherently.** Throughout and after the grant lifecycle, help the public understand what the federal government and local grant recipients are doing, why, how, and how well to increase trust in and appreciation for the grant program, grant recipients, and, one hopes, government.

Grant programs are already doing much of this transparency work. The challenge for them is to do it well, with clear grant program transparency objectives and effective means to gauge whether transparency efforts are working as well as expected and find ways to improve transparency practices. Evolving technologies and growing appreciation for user-centered design and the importance of evidence open up new transparency improvement opportunities.

### **Central Management Agencies**

Grant programs can do much of this transparency work on their own. At the same time, cross-agency action here is likely to be helpful and cost-effective. Grant programs can find examples of useful transparency practices to borrow. They can work together to build knowledge about effective transparency practices and find research to inform the design of those practices relevant to more than one grant program. In addition, they can build and share transparency tools.

**To improve transparency to improve outcomes, strengthen accountability, and demonstrate results,** communicate to:

- **Tell the federal grant story coherently.** The Office of Management and Budget (OMB), working with other federal agencies, should create a performance hub that more coherently tells the “what, why, how, and how well” of federal grants. This hub should show trends and list and describe discrete grant program accomplishments. Performance.gov and USASpending.gov are good candidates to house this hub. Both should at least link prominently to a cross-government grant performance hub. Sites focused on specific outcome objectives, such as HealthyPeople.gov and ChildStat.gov, should also show which grants contribute to each key indicator. Also, outcomes-focused evidence repositories such as PubMed and the Labor Department’s CLEAR (Clearinghouse for Labor Evaluation and Research) site should include information indicating which grant programs contribute to each of the outcome objectives those sites consider. As learning agendas get developed, they, too, should link to governmentwide outcome objective categories and show which grant programs contribute to each objective.
- **Network.** OMB should identify and network people in the federal government working on the same and related outcomes objectives as well as those working on similar grant functions to help them collaborate with each other. OMB, working with Grants CAP Goal leaders and the Grant Quality Service Management Office (QSMO), should also identify and network people in the federal government working to communicate more successfully to grantees, policy makers, and the public to help them learn from as well as collaborate with each other.

- **Learn.** OMB, working with Grants CAP Goal leaders, the QSMO, the Office of Evaluation Sciences in the General Services Administration along with the Performance Improvement Council and Chief Financial Officers Council also housed in GSA, and grant programs should find, build, and share evidence about grant program transparency practices. These transparency practices include evidence repositories, training and technical assistance, and behavior change campaigns. They also include the creation and nurturing of networked improvement communities. Evidence should be found, built, and shared about the effectiveness, cost effectiveness, and equity of these transparency practices.

Related to that, central office and cross-agency grant leaders should help grant programs find ways to collect useful feedback from grantees to gauge the understandability, usefulness, and adequacy of the information grant programs provide to improve outcomes. This may require helping grant programs understand how to gather user feedback within the boundaries of the Paperwork Reduction Act or, possibly, determining where adjustments to PRA boundaries may be needed.

Grant central office and cross-agency leaders can also help grant programs find and curate relevant research to inform their transparency efforts, including behavioral science, persuasion, motivation, social marketing, and other research.

- **Share.** OMB, Grant CAP goal leaders, the Grant QSMO, and other agencies providing cross-agency services related to grants such as Census and Treasury should continue to search for and share examples of good grant program transparency practices. New visualization software, integrated data, and communication methods afford unprecedented opportunities for telling the grant story more coherently and for supporting grant outcome improvement efforts. It makes little sense for every grant program to invest in finding the kinds of visualizations that catch the most attention, get understood most accurately, and stick longer in the minds of target audiences. It makes far more sense to find and share different kinds of visualizations, narratives, and other communication methods for different kinds of grant goals and different users of grant information. Grant programs can also share platforms for communicating with grantees and other goal allies rather than each building their own. Experience suggests that this can lead to more user-friendly interfaces at a lower cost for all contributing grant programs.
- **Build.** Grant programs can also work collectively to build grant transparency know-how where good models don't already exist. For example, R&D programs could work together perhaps through the existing Federal Demonstration Partners network to build R&D genealogies or otherwise show more fully and understandably the remarkable impact of past federal R&D grant spending.

## About the Author

**Shelley H. Metzenbaum** leads The BETTER Project and works with governments and other organizations to help them use and communicate goals, data, analyses, and research in ways that improve outcomes and other dimensions of performance and that avoid triggering discouragement and dysfunction. She currently co-chairs the Standing Panel on Intergovernmental Systems of the National Academy of Public Administration. As a recognized international expert, Metzenbaum teaches and writes about public sector performance and evidence-informed management.

Metzenbaum headed the Office of Performance and Personnel Management at the U.S. Office of Management and Budget during the first term of the Obama administration. In that role, she headed the administration's work with Congress to craft the language of the Government Performance and Results Act Modernization Act of 2010 and federal efforts to implement federal performance law. During her tenure, the federal government launched Performance.gov to provide a single portal to federal goals with quarterly updates of progress and planned next steps on all priority goals and annual reviews on all agency goals and objectives.

Metzenbaum subsequently served as founding president of The Volcker Alliance, an organization launched to increase attention to and excellence in government policy implementation, not just policy formulation. Prior to serving at OMB, she served as associate administrator of the U.S. Environmental Protection Agency for Regional Operations and State/Local Relations, where she steered the launch and implementation of the National Environmental Performance Partnership System and the Sustainable Development Challenge Grant program. Before that, she served as undersecretary of Environmental Affairs in the Commonwealth of Massachusetts, where she initiated several permit reform efforts. She also previously served as director of Capital Budgeting in Massachusetts and headed the City of Boston's Washington office. She ran the Environmental Compliance Consortium housed at the University of Maryland bringing state environmental agencies together to find better ways to measure and manage their compliance and enforcement programs. She also ran the Harvard Kennedy School's Executive Session on Public Sector Performance Management.

Metzenbaum is a fellow of the National Academy of Public Administration and a LEAP Ambassador. She has received a Fed 100 Award, the Harry Hatry Award for Distinguished Performance Measurement and Management from the American Society for Public Administration, and recently delivered the Getzen lecture on accountability at the University of Georgia. Dr. Metzenbaum holds a PhD in public policy from the Harvard Kennedy School and a bachelor of arts in humanities and Asian studies from Stanford University.

## Key Contact Information

Shelley H. Metzenbaum  
The BETTER Project  
Concord, Massachusetts  
[smetzenbaum@gmail.com](mailto:smetzenbaum@gmail.com)