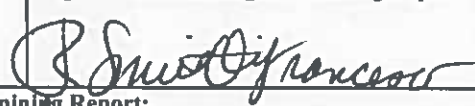
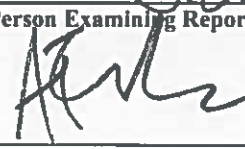


Case Subject: Targeted Community Investment Grants Program	Type of Report: <input checked="" type="checkbox"/> Final <input type="checkbox"/> Supplemental
File Number: 20-00033-I	Type of Investigation: Administrative Review
Period of Investigation: March 2020 – January 2021	Department/Program: Office of Violence Prevention

CITY OF PHILADELPHIA OFFICE OF THE INSPECTOR GENERAL



Investigative Report and Policy Recommendations

Distribution	No.	File Number:	Signature of Investigator Making Report:
Office of the Mayor	2	20-00033-I	
Office of the Managing Director	3	Signature of Person Examining Report:	
Law Department	1		
		Title: Inspector General	Date of Report: February 24, 2021

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I. INTRODUCTION

In response to an allegation of mismanagement of the Office of Violence Prevention's Targeted Community Investment Grant Program, the Office of the Inspector General initiated a review of the process and policies related to the award and oversight of the Targeted Community Investment Grant Program.

The Office of Violence Prevention (OVP) launched the Targeted Community Investment Grant Program (TCIG) in 2019 with great fanfare and exciting expectations for engaging grassroots stakeholders in the city's efforts to combat violent crime. The plan centered around providing funding, financial guidance, and planning assistance to non-traditional smaller grassroots programs that typically lack these types of supports. The goal was to uncover new ways to reach vulnerable populations exposed to threats of violence either as participants or victims of these types of crime. Ideally, a small organic plan might be upscaled to benefit Philadelphia in ways traditional efforts have missed.

From the outset, the OVP Executive Team awarded many grants to low scoring programs that were not recommended. Those grants were awarded with limited instructions and support for financial compliance. OVP then failed to properly ensure that the proposals were executed as planned. And importantly, they collected little to no useful data from grant recipients. As a result, numerous grantees that were non-compliant with requirements during Cohort 1, were again awarded grants in Cohort 2. And after two rounds of funding OVP is unable to say whether any of these programs actually succeeded and may prove effective in addressing the stated goals.

The following report provides recommendations to improve the grant selection process, grant program oversight, and post program follow-up to maximize financial investments made in future funding efforts.

II. TARGETED COMMUNITY INVESTMENT GRANT PROGRAM

In April 2019 the OVP launched the TCIG Program. TCIG was included in the *Philadelphia Roadmap to Safer Communities*, the city's five-year strategic plan to combat violence in the city.

"To combat gun violence in our city, we need to get into communities and partner with organizations that are on the ground doing meaningful, hands-on work with residents. Our new grant program will help us do just that.

The **Targeted Community Investment Grant Program** will provide funding to community-based organizations that offer high-quality violence-prevention services and support. Ranging from \$500 to \$20,000, the grants will support both new and existing programs that will help prevent or reduce gun violence among youth and young adults. We'll focus on the neighborhoods that are most prone to violence.¹"

¹ <https://www.phila.gov/2019-04-09-new-community-grants-support-grassroots-violence-prevention/>

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Goals of the TCIG program include identifying areas in the city most in need of violence prevention services, diversifying the services provided, and referring participants to other programs for support. Recipients were encouraged to disperse information through flyers, collaboration amongst grantees, and social media.

One of the most exciting aspects of this grant process was that it was designed to be easier to navigate by smaller capacity programs. Conceptually, the belief was, and is, that there are many great untapped ideas from people in the communities most directly affected by violence and how best to deal with the issues on their blocks and amongst their own neighbors. The goal was to assist those programs to overcome the challenges of capacity and inexperience with the grant process and for the city to help with training on program management and grant writing in order to empower them to go look for other grant opportunities in the future.

III. APPLICATION AND SELECTION PROCESS

A. Process

1. The Application

OVP did initial outreach for the TCIG by holding workshops throughout the city in high crime areas and through press releases. Applicants were also able to go into the OVP office and have one-on-one sessions to ask questions of the Program Specialist, the OVP staff member with primary responsibility for TCIG.

The application consisted of a short description, longer program details section, and sections that covered the following topics: feasibility, project descriptions, target audience, partners, location, community engagement, technological capabilities, safety, short and long-term goals, and budget.

Applications were opened on April 9, 2019, with a submission deadline of April 30, 2019. 409 applications were received in the first grant cycle, from which 47² awardees were selected, receiving grants totaling more than \$750,000. The grants were awarded on June 17, 2019 and programming ran from July 1, 2019 through September 29, 2019.

Applications for the second cycle opened on September 30, 2019, with an application deadline of October 31, 2019.³ Of 300 applicants, 53 grantees were selected. The budget for the second cohort was \$1M. Originally, grant activities were supposed to be completed by June 30, 2020, but due to COVID 19 that deadline was extended to October 31, 2020. Four Cohort 2 recipients declined their

² 46 recipients had grant activity occurring during Summer 2019. One Cohort 1 recipient declined funding due to internal issues in their group.

³ <https://www.phila.gov/2019-09-30-city-launches-2nd-round-grants-for-community-based-organizations/>

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grants because COVID 19 made their programs (large in-person activities such as basketball) not feasible; two others started but could not complete their programs due to COVID 19 issues.

The application for the third cohort launched on November 9, 2020 and was open until December 4, 2020. It is budgeted at \$500K. The start date for Cohort 3 is pending.

TCIG Funding Source	Cohort 1	Cohort 2	Cohort 3
City of Philadelphia (General Fund)	\$ 500,000	\$ 1,051,901	\$ 500,000
Pennsylvania Commission on Crime & Delinquency (State Funding)	\$ 250,000	\$ -	\$ -
Total	\$ 750,000	\$ 1,051,901	\$ 500,000

2. Application Review and Selection

A board comprised of directors and senior strategists from approximately ten city departments was assembled to review applications.⁴ Each application was evaluated and scored by two board members, using a rubric for guidance. No formal training on the review process was administered. The reviewers scored each category of the application and gave each application a “yes” or “no” recommendation. Where awards were recommended, reviewers were able to suggest modifications to the dollar amount requested. The data was input to a spreadsheet, where applicants were scaled as high, middle, and low and forwarded to the Executive Team at OVP who made the final selections. Incomplete applications were not to be considered.

In the first cohort approximately 400 applicants were scored in various categories on a five-point scale by two independent reviewers. Category scores were averaged to arrive at a score from each reviewer and then the two reviewer scores were averaged to give each application a final score out of five.

In the second cohort approximately 300 applicants were scored in various categories by two independent reviewers on a 32-point scale. Scores were reported to the executive team with a rating of A, B, or C. An A rating was given to those receiving a final average score of 26-32 and color-coded green, B to those with a 17-25 and color coded yellow, and C to those with a 16 or below and color-coded red.

None of the applicants were interviewed and no research or investigations into the individual applicants or their organizations was conducted. Recipient selection was based solely on the applications, and the Executive Team’s personal knowledge of the applicants. Recommendations were made by the Program Specialist based on diversified locations and activities, but the Executive Team made the ultimate decisions.

⁴ Board members were chosen from trusted partner agencies whose work intersects and aligns with OVP, including the Department of Human Services, Town Watch, Parks and Recreation Department, among others. Their selection was based on their understanding of the grant process and the goals of the program, and their respective positions within their own agencies.

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B. Practice

In practice many applicants were awarded despite low scores and negative recommendations⁵. Some incomplete applications were considered, and even awarded grants. The Program Specialist did raise concerns about some recipients, specifically their ability to hit benchmarks, their lack of planning, and lack of feasibility of their programs, but they were approved despite her negative recommendations. Reviewers were surprised that some applications they had scored very highly did not receive grants. OVP has said that it was necessary to consider and award grants to low scoring and unrecommended applicants because worthwhile organizations and projects would be overlooked. They believed many applicants were scored poorly by reviewers because the inexperienced grass roots applicants were not good at writing applications. While some grantees were individuals heretofore unknown, many of the recipients were well known in the community and to the Executive Team. The data below demonstrates that reviewers' scores and recommendations were largely disregarded.

⁵ This report focuses on the administration of the grant, and not Reviewers' evaluations of individual awardees and the programs they may or may not have carried out.

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1. Cohort 1

- 101 applicants with score over 3 and two “yes” recommendations (represented on the right of Figure 1)
 - Only 18 of the 101 were awarded grants (represented on the right of Figure 2)
- Half of the grants were awarded to lower scoring and non-recommended applicants
 - 15 applicants with scores less than 3 were awarded grants (represented by orange and red bars of Figure 2)
 - 19 applicants that received at least one recommendation against funding were awarded grants.

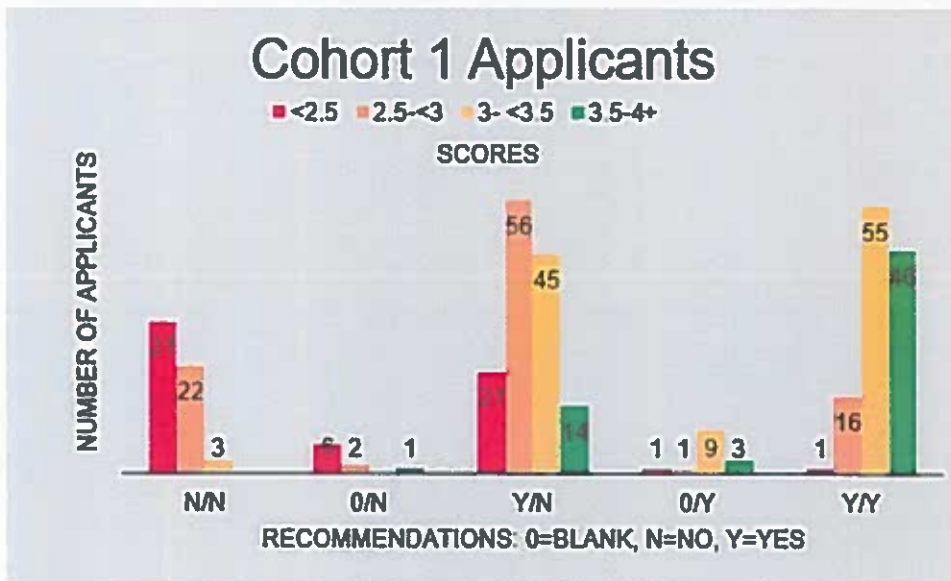


Figure 1

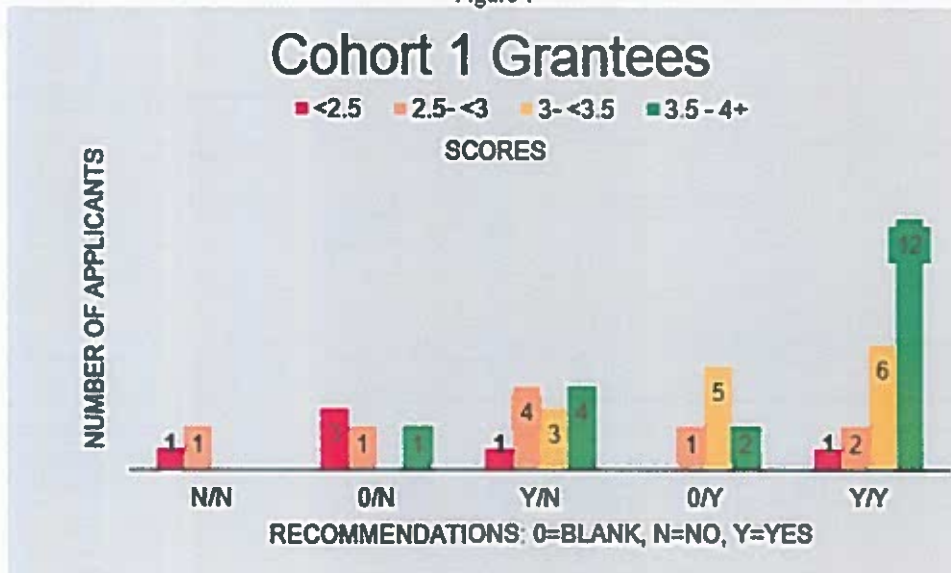


Figure 2

Figures 1 and 2: Reviewers' combined scores for each project are indicated by color. The bottom axis indicates the recommendation by each grant's reviewers. For example, Y/N indicates one reviewer said yes, while the other said no.

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2. Cohort 2

- Grantees spanned scores of 10 to 32 (on a 32-point scale)
- Seven grantees had scores of 16 or less, the bottom 21% of all applicants
 - Five of those grantees received awards in the top funding tier of \$15,500-20,000
 - The lowest scoring grantee ranks 288 of 298, the bottom 4% of all applicants
- Thirty applications were evaluated by only one reviewer
 - Of those, 6 received grants despite low scores, 2 while receiving a “NO” recommendation⁶

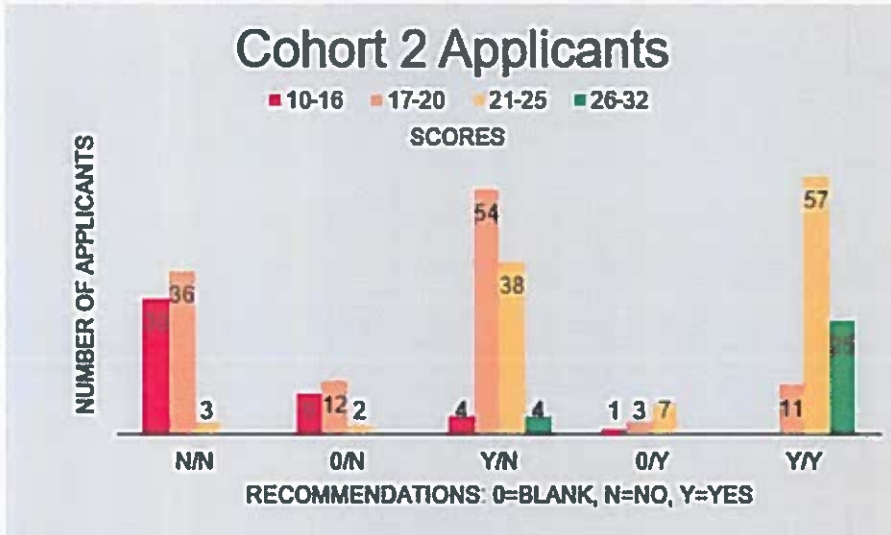


Figure 3

Figures 3 and 4: Reviewers' combined scores for each project are indicated by color. The bottom axis indicates the recommendation by each grant's reviewers. For example, Y/N indicates one reviewer said yes, while the other said no.

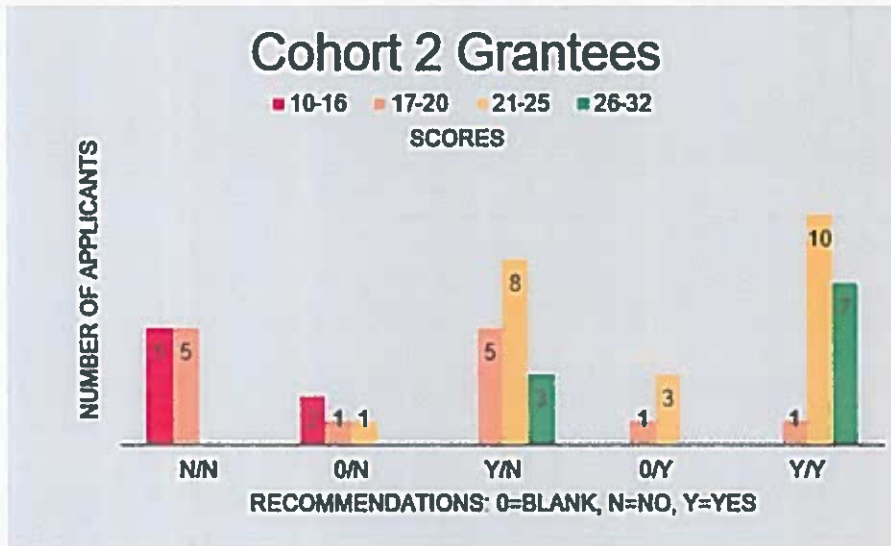


Figure 4

Note: Although OVP used only three designations for Cohort 2 scores: A (green: 26-32), B (yellow: 17-25) and C (red: 16 or below), the above chart shows four – dividing the B category into high middle (yellow: 21-25) and low middle (orange: 17-20). OVP's middle category was too broad, encompassing 75% of all applicants and scores that ranged from 17/32 (53%) to 25/32 (78%).

⁶ One reviewer failed to submit data for their assigned applications. OVP proceeded with just one review.

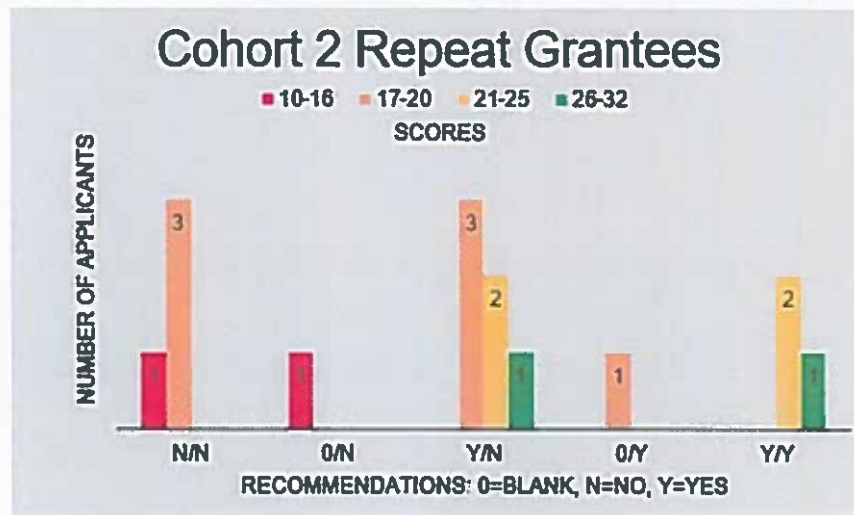
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a. Failure to Scrutinize Repeat Cohort 1 Grantees

Of the 53 applicants selected for grants in Cohort 2, fifteen were already Cohort 1 grant recipients. OVP did not look at any Cohort 1 activity in evaluating the Cohort 2 applicants. All grantees in Cohort 1 were required to submit grantee surveys, participant surveys, and sign-in sheets; they were asked to submit photographs, and other program materials (flyers, reports, schedules, etc.) Very few of the original forty-six grant recipients complied. Of the fifteen repeat grantees, not one fully complied with the required submissions and four failed to submit any documentation at all.

COMPLIANCE WITH REQUEST FOR MATERIALS	46 Cohort 1 Programs	15 Cohort 1 Programs also awarded a Cohort 2 grant (Cohort 1 materials)	15 Cohort 1 Programs also awarded a Cohort 2 grant (Cohort 2 materials)
# that submitted any participant surveys	10	5	7
# that submitted any sign in sheets	10	5	5
# that submitted any program photos	8	3	5
# that submitted program materials other than photos (report, flyer, schedule, etc.)	10	4	2



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3. Cohort 3

As of this writing, applications for the third cohort have been reviewed and scored. With insights from previous efforts offered by OIG investigators, the Program Specialist made meaningful revisions to the recommendation spreadsheet. Emphasis will be given to highlight those applications receiving the highest scores and two “yes” recommendations. The Program Specialist will also provide first-hand knowledge of previous grant recipients and whether they had submitted the required survey to reviewers.

4. Per capita costs of programs

In Cohort 1 the application did not ask how many people were expected to be served by proposed projects. Funding was awarded without any indication of how many would be served or at what cost. In Cohort 2, the application did include this question. Nevertheless, many projects were knowingly given top awards of \$15,000 - \$20,000 while only serving 10-20 participants at a per capita cost of \$1000 - \$2000. Conversely, other grantee projects served 100 or more participants at a per capita cost under \$100.

IV. SUPPORT & OVERSIGHT BY OVP

OVP is responsible for providing programming support and oversight of TCIG. This includes administrative tasks such as orienting grantees to the grant process; trouble shooting issues that may hinder a grantee’s ability to carry out their proposal; acting as a liaison with Urban Affairs Coalition⁷, and answering questions on a daily basis. Oversight functions include attending grant programming; collecting, requesting, reviewing, and managing program documents; eliciting feedback from and providing feedback to grantees; evaluating programs; and interacting in the community.

A. Limited capacity

Support, oversight, and follow up of all TCIG programs is primarily carried out by one OVP member, the Program Specialist, with an occasional volunteer from another city department, and more recently with the assistance of an intern. While having primary responsibility for TCIG, the Program Specialist also assists with other projects, including the Gun Violence Initiative (GVI) and Community Crisis Intervention Program (CCIP).

B. Oversight

1. Program visits

During the first cohort \$250,000 of TCIG funding came from the state through the Pennsylvania Commission on Crime and Delinquency (PCCD). In compliance with PCCD’s oversight of state funding, the Program Specialist took a PCCD representative on required program site visits, visiting twenty-one of forty-six grantee programs.

⁷ Urban Affairs Coalition is the fiduciary sponsor of the program.

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During Cohort 2 all TCIG funding came from the city. In August 2020 an intern was added to assist with TCIG. During the second cohort, ten of forty-seven programs were attended by either the Program Specialist or intern.

Of the fifteen grantees that were funded in both cohort 1 and 2, six were visited once, and three were visited twice, while six were never visited. When programs were visited there were no visitation checklists or directions to guide observation or evaluation of programs, and no photos or notes were taken.

2. Materials Collection and Review

Grantees were required and agreed to provide sign-in sheets, participant surveys, and other materials under the *Approved Scope of Services* agreement which outlined their responsibilities in receiving grant funding. Grantees were also asked to submit photographs and program materials. Most recipients did not provide the required and requested materials, and where materials were provided, they were sparse. Because Cohort 2 commenced the day after Cohort 1 closed, OVP had no capacity to go back and get materials that were not submitted.

3. Meetings

A few optional meetings, attended by less than 50% of grantees, were held to go over deadlines and close out items. No mandatory meetings to track project progress or build peer connections were held.

4. Training on program management and grant writing

A goal of TCIG was to train grassroots endeavors on program management and grant writing so that they could benefit from other grant opportunities. Besides the initial one-hour orientation meetings with OVP and UAC there were no training sessions.

5. Providing feedback to grantees

A lack of staffing and no time for after action review between cohorts made it impossible for OVP to provide feedback and guidance to grantees.

V. ROLE OF URBAN AFFAIRS COALITION

Urban Affairs Coalition (UAC) is the fiscal sponsor for the program. This arrangement commenced with a request for proposal (RFP) issued by the city in February 2019 to support the TGIC. UAC, who OVP had previously worked with on the Youth Violence and Crime Reduction Partnership (YVRP), was the sole applicant and was selected as the city's fiduciary manager of the TCIG program.

UAC acts as a 501(c)(3) organization for the groups, allowing grant recipients to gain fiscal benefits that often challenge small start-up non-profit efforts. They process the financial paperwork from the recipient

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programs and make payments and reimbursements. OVP establishes the amount of each grant, the grantee submits their budget to OVP, and they in turn transmit that information to UAC.

UAC trained the grantees on how to document and submit expenses. They instructed recipients to complete required documents and provide corresponding purchase orders, invoices, W-9s, and receipts in order to have expenses covered by the city's grant. In this regard, UAC fronts all funds and is reimbursed by OVP. UAC cut checks every other week after reviewing all expenses submitted, ensuring that the proper documentation to support the contract relationship was received.

UAC reported some new internal challenges operating this program. Their experiences primarily lie with established businesses and organizations. The TCIG grantees tend to be grass roots individuals (block captains, grandmothers, students) who are not experienced in grant documentation reporting and at times had unrealistic expectations for how the process worked. UAC had to adapt their process and retool their training for these individuals and organizations. In Cohort 1, all grantees had to attend a mandatory one-hour fiscal orientation meeting with UAC. In Cohort 2, a 45 minute one on one session was added to discuss project specific fiscal processes based on approved budget.

In instances where UAC recognized issues with the documentation grantees provided (such as a lack of consultant agreements, timesheets to support salaries, sparsely completed invoices, and expenditures that exceeded grant budgets), they raised these concerns with grantees and OVP. While UAC worked with grantees to resolve many issues, OVP became involved as needed, assisting grantees in correcting their documentation. UAC also raised nepotism and conflicts of interest issues (for example, programs that gave consultant agreements and vendor contracts to family members, a grantee who collected consultant fees from his own program and another, and a grantee who sought reimbursement for a \$2200 cash payment to an employee of his catering business).⁸ OVP reported that where deficiencies remained expenses were not covered. However, UAC reports that OVP ultimately authorized payments in most cases.

On OVP's side, they and grantees felt challenged by the UAC's process as well. Finding it too cumbersome for unsophisticated grantees and extensive documentation requirements often led to delays in disbursements. OVP also had an expectation that UAC would educate the TCIG recipients on the intricacies of financial management and documentation. UAC's "Spring FY20 Proposed Scope of Work" stated, "We understand that the selected grantees may have a wide range of experience and expertise managing grant funds and we will provide the support appropriate to the needs of each." Unfortunately, UAC did not provide the level of support that many TCIG grantees required and that void fell on an understaffed OVP to attempt to fill. The Program Specialist was left spending a great deal of time providing technical assistance to recipients in navigating UAC including explaining documents, reiterating schedule deadlines, and providing cheat sheets on how to complete documents.

⁸ The scope of this report does not include investigation of individual actions within grant awards.

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Minneapolis OVP Community-led Violence Prevention Programs

Philadelphia's TCIG was modeled after the City of Minneapolis's Collaborative Public Safety Strategies (CSS), launched in August 2016, and administered under the Mayor's Office of Neighborhood and Community Relations. The program focused on neighborhoods most impacted by violence, elicited input from community members on how best to promote safety and allocated \$500,000 in community grants. CSS was expanded in 2017, but in 2018 it was discontinued for lack of data to justify continued funding.

In 2018, the city created the Minneapolis Office of Violence Prevention (OVP) under the Health Department. OVP has several initiatives focused on preventing violence at all stages: before it begins, at the first sign of risk, and after an incident. Two grant programs specifically focus on funding and capacity building community-led strategies to address violence – the Blueprint Approved Capacity Building Institute and the Neighborhood/Community-Specific Violence Prevention Fund.

Blueprint Approved Capacity Building Institute (BPAI)

BPAI is a one-year grant program focused on developing small grassroots community organizations. Grantees spend six months training on hard and soft skills (grant writing, budget planning, program evaluation). Upon completion of trainings, participants receive a \$6000 grant and have four months to translate their newly acquired capacity into implementing a violence prevention program. Following that, they spend two months focused on evaluation and reflection. Throughout, they receive hands-on support from OVP staff and are engaged in a peer network with their fellow participants. Capacity building enhances agencies' services and increases their ability to secure other funds. BPAI was named a model practice by the National Association of County and City Health Officials' Model Practice Program.

Neighborhood/Community-Specific Violence Prevention Fund

	Eligibility	Funding	Project Limitations
Category A	Neighborhood, cultural, non-profit, and faith organizations, businesses, or others; Individuals are excluded	up to \$25,000	Projects must last at least one month; no more than 35% of the project budget may be used on a single event
Category B	all the above and individuals	up to \$10,000	No minimum duration for project activities; may be a single event

Collaborative application review and selection process

The programs use both community members and city staff to review applications in a collaborative process. There are procedures to uniformly train reviewers and avoid conflicts of interest. Each application is reviewed by at least nine people, after which reviewers participate in panel discussions. In some cases, applicants are interviewed as part of the decision-making process.

Data Collection and Measurable Outcomes

With its hands-on approach, the Minneapolis OVP has been successful in collecting data and transparent reporting of grantee projects and outputs (# of events, direct participants, individuals in the community reached, # meals served, # connections to resources, # young people receiving skills training, etc.).

Grantees are given a reporting template at the outset and reminded about it frequently throughout the grant cycle, including during several mandatory meetings. The template requires specific outputs, including how the numbers were determined, as well as questions that elicit narrative responses about how activities differed from proposals, successes, challenges, impacts, information acquired, and more.

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VI. MEASURING SUCCESS

While data and metrics are essential in analyzing almost all program funding efforts, TCIG commenced with no specific plan in place to measure the program's success. At the completion of Cohort 1, after providing funding for forty-six programs, OVP collected a limited amount of data, consisting mostly of sparsely completed surveys and sign-in sheets from only a few programs. OVP concluded Cohort 1 not knowing how many people were served by the grants and with no way to measure whether any of TCIG goals were met. Cohort 2 commenced with little expectation to remedy this obvious and admitted short coming, due in part to the fact that Cohort 1 closed on September 29, 2019 and Cohort 2 commenced the next day.

A research and data analyst with GovLabPHL began assisting with program data collection and analysis during Cohort 2. They helped OVP write and launch online surveys for both grantees and participants. In June 2020 links to both surveys were sent to grantees. Grantees were asked in turn to send the link to their participants; grantees were given discretion on when to send out the link. Both groups were asked to submit their responses by November 14, 2020. After that, outreach was performed to collect missing data. As of January 7, 2021, only 60% of Cohort 2 programs had responded, and many only providing the most minimal information.

A. Analysis of Feedback Surveys

On January 25, 2021 OVP and GovLabPHL produced a power point presentation, *2020 Targeted Community Investment Grants for Violence Prevention Analysis of Grant Applications and Feedback Surveys*. The presentation was based on previously known statistics about the applicants and grantees as well as some data gleaned from the Cohort 2 grantee and participant surveys. Generally, the presentation furnished no new information, other than a few photos from programs and skewed survey data.

1. Grantee Survey

While the grantee survey was a requirement of TCIG that grantees acknowledged by signature, many did not complete it. The survey was intended to be an easy to complete substitute for a grant report, which most grant programs require. The presentation reports grantee data as representative of TCIG, however only thirty of forty-nine programs are represented. The data is further distorted by the fact that of the thirty programs that completed a grantee survey, nine completed more than one, over representing, and in some cases contradicting, their program.

2. Participant Survey

484 grant program participants fully or partially completed the survey. Participants were responsible for knowing the number assigned to their particular program and entering that information on the survey form. Responders identified themselves as representing twenty-eight of forty-nine programs, the other twenty-one programs had no participant surveys. This means that only 57% of the programs are represented in the survey data. Additionally, when one considers that 296 of the 484 surveys, or 61% came from just six programs, the data is skewed further. Finally, twenty-four surveys were submitted without a program number and nine with grantee numbers where programming had been cancelled due to COVID. This further calls into

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question the meaningfulness of the survey data collected. The presentation glosses over these facts and presents the survey data as though it is representative of the TCIG program, when it primarily reflects participant feedback on six programs, says little about twenty-two, and nothing about twenty-one.

3. Survey Analysis and Presentation

OVP still lacks even a rough estimate of how many individuals were served by the programs⁹, or to what degree TCIG goals have been met. Grantees self-reported the number served on the grantee survey by choosing a category. The highest was 100 or more, yet no clarity whether it was 100 or 500 people involved; ten programs that claimed to have 100 or more participants had no participant surveys submitted.

There is no analysis of individual programs, or even program types, and no metrics on success. There is nothing in the presentation that shows what programs work, where money should be spent in the future, and whether any have the capacity to scale up.

The presentation closes with a slide titled “Potential Takeaways” and ends with the following statement, “Implement strategies that help promote and share violence prevention efforts within the community.” This was the premise of TCIG at its inception.

VII. ANALYSIS & RECOMMENDATIONS

A deeper reflection of the data presentation and the components of the grant program suggest that OVP has spent two years and nearly \$1.8M to identify challenges in running a small-scale community grants program.

A. Selection Process

Prior to awarding new grant awards, OVP should revise the selection process for recipients including adding a third reviewer to provide more balanced application evaluation, follow reviewer scoring and recommendations, take into account Program Specialist input, look at past performance of repeat applicants, and add interviews and background checks of applicants.

1. Additional Reviewer

In Cohorts 1 through 3, only two reviewers were used to evaluate applications, and in some instances only one. Reviewers understandably bring their own experience and perspective to the process. In many cases this resulted in great disparities between reviewers’ scores and recommendations. The addition of a third reviewer would add balance and objectivity to the process. The number of reviewers designated to evaluate applications should be met in all cases; no applications should receive only one review.

⁹ Cohort 2 continued to see a lack of participant sign-in sheets.

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2. Follow reviewer scoring and recommendations

OVP should follow the reviewer scoring and recommendations in making selections. OVP set up a process for each application to be reviewed by two reviewers and given a recommendation of yes or no for funding. Logically, a threshold would be set for applicants and only those meeting that threshold would move on to the next round of consideration. A threshold could take many forms: all those who received a certain score and 2 “Ys,” or the top 25% of the applicant pool, or the top 100 applicants. Clearly, no such threshold or distinction was made in awarding grants in the first two cohorts. Some of the lowest scoring applications, with “no” recommendations from both reviewers were awarded grants. This taints the process and places the Executive Team in a compromised position. Ignoring a rating and recommendation process without further justification only adds to that concern.

a. Alternatively, thoroughly revise the application and review process

OVP has said that low scoring and unrecommended applications were considered and awarded grants by the Executive Team because they believed that worthwhile organizations and projects were scored poorly by reviewers because the inexperienced grass roots applicants were not good at writing applications. If this is the case, then OVP’s application and review process is flawed. As the data demonstrates, in both Cohorts 1 and 2, OVP largely disregarded reviewers’ evaluations. OVP attempted to design an application that would be easy for inexperienced grant applicants to complete, enlisted trusted partners to review those applications, and then chose grantees that did not align with the process. If the application and review process does not result in distinguishing the applicants best suited to benefit from TCIG and promote its goals, then it should be revised to do so.

3. Acknowledge Program Specialist input in selecting grantees

The Program Specialist has, more than anyone else, interacted with every grantee and many applicants. She has first-hand knowledge of what works and does not generally, and of individual grantees specifically. Even as early as the Cohort 1 selection process the Program Specialist voiced concerns about some of the applicants that were selected for grants, emphasizing deficits in their ability to execute their proposals. Her concerns went unheeded. After working with the Cohort 1 grantees, she had even greater insight into which programs had laid out feasible plans. At this point she had worked with some of the Cohort 2 applicants that had been Cohort 1 grantees. Again, her insight and concerns were disregarded. The Executive Team should acknowledge, seek out, and consider the Program Specialist’s input in making grantee selections.

4. Scrutinize past grantees

Where applicants are former grantees, the Executive Team should look at past performance in assessing whether to award another grant. Fifteen Cohort 1 grantees were given grants in Cohort 2 that did not comply with required submissions, and four submitted nothing. It is a waste of limited resources to refund programs that do not comply with TCIG requirements when there are

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many other high scoring, deserving programs that could benefit the community through TCIG funding.

5. Add a background check

OVP should add a background check of applicants selected for grants before finalizing awards. This is important since many applicants are unknown entities with no established programs, organizations, or experience. Even a brief background check may disclose information about the individual or organization that would give pause in making an award.

6. Add an interview

OVP should add an interview of applicants selected for grants before finalizing awards. The city awarded grants as high as \$20,000 based on a few page application. Interviews would aid in evaluating whether individuals and organization have the capacity to carry out their stated programs. It would also allow OVP to gauge how much assistance a particular program would require so that they could plan their own staffing accordingly.

7. Per capita cost of programs

Many projects were knowingly given top awards of \$15,000 - \$20,000 while only serving ten to twenty participants at a per capita cost of \$1000 - \$2000. Philadelphia has been suffering from growing violence while also experiencing a shrinking budget due to COVID 19. While it is always important to use public funds responsibly and efficiently, it is even more important now to use limited TCIG resources in the most impactful way possible. Recognizing that there may be some exceptions simply due to the nature of the grant's goal of reaching up-and-coming organizations, OVP should consider choosing programs that have the most direct and widespread impact on violence prevention whenever possible.

B. Support and oversight during program period

1. TCIG requires additional staffing

In its current size and scope, the capacity of one person working on numerous grants with little time for analysis and expectations to implement changes is a major challenge. Administrative tasks must be completed in order to get programs started and keep them running. As such they take priority, leaving little time for oversight or after-action reviews. This results in the Program Specialist having to take short-cuts in some areas and barely being able to scratch the surface in others.

Multiple sources suggested that a minimum of three staff would be required to appropriately implement this type of grant, with as many as five being ideal. Additional staff could collect data, assist in providing technical assistance and ensuring protocols were being appropriately followed throughout the grant process.

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2. Program visits

The city has an interest in the quality and effectiveness of the TCIG programs. As such sending an OVP staffer to visit or check-in on programs should be a priority. This is especially necessary in light of the fact that most programs fail to submit sign-in sheets, photos, or participant surveys, leaving the city with no way to measure how many people are served by the programs and whether or not they are having the intended impact.

Hands on monitoring has not been a priority. The number of programs that OVP could visit was limited by staff capacity, however where visits occurred during Cohort 2, they could have been prioritized better. During Cohort 1 with only one staffer and while programs were in person, twenty-one programs were visited. This was largely driven by PCCD's oversight of state funds which required site visits. Cohort 2 was funded solely through the City of Philadelphia General Fund. During Cohort 2, with the addition of an intern, and when the logistics of visitation would be easier since many programs were forced on-line due to COVID 19, only ten were visited. Additionally, three of the ten that were visited in Cohort 2 were grantees that had been visited during Cohort 1 while six repeat grantees were not visited in either cohort.

When programs were visited there were no visitation checklists or instructions to guide observation or evaluation of programs, and no photos or notes were taken. For Cohorts 1 and 2 there is nothing to document that a visit occurred and no data to use for feedback, analysis, or to measure success.

OVP has stated an intention to use interns to visit programs during Cohort 3. While this is a step in the right direction, having actual criminal justice professionals engaged would prove much more beneficial from not only an experience perspective but to reaffirm accountability of the city's investments. Visitation checklists and/or instructions should be produced to guide OVP staff as to important observations and data collection in the visitation process. A standard form to be completed for each visitation should be produced so that consistent data can be collected.

Visitations have the potential to provide meaningful reporting to OVP, as well as feedback to grantees on what they are doing well and recommendations for improvement. They also provide an opportunity to speak to participants first-hand to solicit conversational feedback, which would be more insightful than the few sparsely completed surveys that often provide no meaningful information.

3. Materials Collection and Review

Grantees were required to provide certain materials and requested to provide others, but most grantees failed to do so in whole or in part. Materials submissions were largely left until the end of the grant cycle. The back to back timing of cohorts left no time for OVP to collect missing materials or thoroughly review materials received.

In encouraging compliance, it should be made clear to grantees that programs that do not submit all required documentation will be ineligible for future grants, and that policy should be

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followed. OVP awarded Cohort 2 grants to fifteen Cohort 1 grantees who did not comply in whole or in part with required submissions. This sent the message that “required” did not really mean “required,” and compliance was not necessary. Predictably, thirteen of the fifteen again failed to fully comply.

OVP should urge all grantees to submit an abundance of evidence of programming (every flyer, social media posts, photos, etc.) and to do so immediately as programming occurs instead of waiting until the end of the grant. This would allow for review and feedback throughout the grant cycle. For example, at the outset all grantees should be publicizing their events. They should be reporting this and OVP should be able to look at flyers and check social media to ensure that grantees are reaching their intended audiences. Where there are no or insufficient submissions from grantees, OVP should follow up immediately.

C. Post Grant Cycle Review

A time to look back is instrumental in evaluating not only success but also potential for growth in the future. As the grant cohorts have run their course, OVP staff have found areas that present more challenges than others to certain organizations. Rather than fitting square pegs in round holes, an effort should be made to separate groups that are positioned to benefit from the grants funding but are also able to work within the scope of supports available. Time for proper reporting, data analysis and review of the previous cycle is critical to fairly assessing the program and potential grantees.

1. Meaningful program specific review and evaluation:

Assess programs with a focus on what works, what does not, what needs improvement and what future programs can learn from past programs.

2. Transparency

OVP should provide transparent public reports on program specific activity, outputs, and impact. Discussions about what is working and what is not, may generate new ideas outside of the TCIG bubble for future applicants and others interested in violence prevention in the city.

3. Providing feedback to grantees

While completing program specific review, OVP should contact each grantee to solicit information not contained in the documents and to provide feedback to the grantee. At this time the grantee could also ask questions and be advised of other opportunities in the interest of continuing and expanding their programs.

a. Post programming grantees meeting

At the outset of each cohort OVP holds orientations where grantees meet and introduce their programs. OVP should hold a post program collaborative meeting. This would be an opportunity for grantees to discuss challenges and successes so that they could learn from each other.

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b. Mentor program

Some TCIG grantees are smaller established not for profits with experience managing grants. OVP should identify these organizations and inquire whether they would be willing to mentor less experienced grassroots organizations. This would provide smaller programs with much needed guidance, promote TCIG's goal of collaboration, and supplement OVP's lack of capacity.

D. UAC/Fiscal Sponsor

OVP and grantees have complained about the extensive documentation required by UAC that led to delays in disbursements while UAC has raised concerns about incomplete documentation, nepotism, conflicts of interest, and budget overages.

1. Fiduciary standards must be maintained

OVP should take responsibility for educating applicants. Even though the program is designed to reach unsophisticated grant recipients, there are certain minimum standards that must be met in order to maintain integrity in releasing public funds. OVP has said that one of the goals of TCIG was to introduce and train those new to the grant process to empower them to go look for other grant opportunities. Other grant processes will not be as easy as TCIG. In order to prepare for other grants, recipients need to deal with the requirements that UAC imposes.

2. UAC should be prepared to provide more support to grantees

UAC was aware that TCIG would be targeting many first time "mom and pop" programs. UAC's "Spring FY20 Proposed Scope of Work" stated, "We understand that the selected grantees may have a wide range of experience and expertise managing grant funds and we will provide the support appropriate to the needs of each." UAC has not provided the level of support that the TCIG grantees needed. This is evidenced by the extensive time that OVP has spent providing assistance to recipients dealing with UAC. This additional effort by OVP has limited OVP's capacity to provide program support and oversight in other areas. Whether it is UAC, or another organization, the fiscal sponsor for the program should be required to fulfill this important aspect of the program.

3. Nepotism and conflicts of interest should be avoided

UAC has raised concerns about nepotism in grantees' contracts. Grantees should be bound by the same nepotism and conflicts of interest rules as other city employees and contractors. The Philadelphia Code §20-607 and Executive Order 1-11 both prohibit nepotism; the Office of the Chief Integrity Officer encourages all employees to avoid conflicts of interest. In the grant context, nepotism and conflicts of interests may be perceived as misappropriation of funds.

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In dealing with public funding the utmost transparency and integrity should be exercised. Grantees should be trained on avoiding nepotism and conflicts of interest and UAC should continue their scrutiny of these issues.

E. Measuring success

Data is critically important to support further funding, confirm that the program is meeting its goals, and improve it going forward. OVP launched TCIG without a specific plan to collect data and measure success.

1. Cohort 1

At the conclusion of Cohort 1, besides the documents that UAC required for processing payments there was little to no documentation by the majority of grantees to show that they held the program that was proposed and funded, and that they served the intended population. Where there is data, it is sparse and of little quality and has essentially served as information to improve the grant process and management practices rather than to determine if the grants are actually making the differences they are intended to make.

2. Survey Administration and Analysis

The analysis fails to provide any meaningful information that can be built upon. There is no data on the number actually served by each program, individual program success, and nothing to measure TCIG's impact on neighborhoods or violence.

In the presentation, Cohort 2 survey data is compiled together and presented as representative of the entire TCIG program. Some programs had no respondents while others had a great deal. Presenting the data as an overview of all programs is at best inaccurate, and at worst, disingenuous.

a. Survey questions

For Cohort 2 there were two surveys coauthored by GovLabPHL and OVP – a grantee survey and a participant survey. Surveys must be written to elicit meaningful data that can be used to measure success. While the grantee survey elicited both specific programming provided and demographic information, it is self-reported by grantees with no verification process.

Participant surveys can be used to verify and expand upon the information obtained from grantees by comparing data for consistency. The participant survey consisted of nine questions, many poorly drafted, which are not specific enough to elicit meaningful feedback necessary to evaluate specific programs.

For example, the survey asked, “Did you learn new knowledge that you believe will help you stay safer in your community?” That’s a double barrel question that should be two questions – Did you learn new information? Do you think it will help you stay safer in

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your community? Even breaking it down into two questions still leaves the analyst wondering what knowledge was learned and how will it help the participant be safer?

There are no follow up questions to elicit specifics about what worked and did not in each program. While there was one final "Additional Feedback" field at the end of the survey where participants could write about anything, the survey could have benefited from specific open ended questions throughout, such as "What new skill did you learn?"

Future surveys should be drafted using both specific questions and open-ended questions aimed at verifying grantee information, and eliciting specifics about what works and what does not.

b. OVP should investigate why certain programs had less participant surveys.

There are obviously data collection issues when twenty-one programs had no participant surveys, 61% of participant surveys represent just six programs, and ten programs that claimed to have 100 or more participants had no participant surveys completed.

OVP should look into the causes of these data deficiencies to correct them. When were survey links sent to grantees in relation to when programming was held? Were participants more likely to complete surveys if they were sent contemporaneously? Did certain program's participants find an on-line survey more challenging to complete and would they be more likely to complete a paper survey while physically at the program? Did some programs fail to send the survey link to participants?

OVP should require grantees to blind copy OVP or GovLabPHL when the survey link is sent out. This would ensure that it was sent; show how many people it was sent to and compute a response percentage for each program.

c. Program identification

Several participant surveys were submitted without the program number completed. This makes the rest of the survey data useless. The program should be a mandatory field. On paper surveys distributed at programs that field should be prefilled. For on-line surveys, there should be a drop-down menu with the programs listed by title so the respondent can choose their program; respondents should not be able to proceed with the survey without completing that question.

3. Focus Groups

The survey asked if participants would be willing to take part in a focus group to provide additional feedback about their experience. 61% of respondents said they would and provided contact information. OVP should hold focus group meetings to better understand what worked and what did not in the programs.

4. Grantees who do not comply with surveys should be ineligible for future grants

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Once a survey is written the next hurdle is getting grantees and participants to complete the surveys. Grantees were required in accepting the grant to complete the grantee survey. As stated previously regarding other required materials, it should be made clear to grantees that programs that do not submit the required grantee survey will be ineligible for future grants.

Likewise, grantees bear responsibility in the collection of participant surveys. Although grantees cannot force participants to respond, as described above there should be a mechanism for OVP to verify that grantees sent out the survey link to participants. Grantees that fail to do so should be ineligible for future grants.

5. Targeted follow up and data collection

a. Participants

OVP should collect data on program participants for a future follow up study. Reconnecting with participants in five years to see “where they are now” (college student, business owner, victim of crime, perpetrator of violent crime) would measure the long-term impacts of TCIG.

Some programs are specially situated for periodic follow up of participants. Job training and entrepreneurial programs should check in with participants at preset intervals. For example, at three, six and twelve months:

- Are you schooling or working in subject area that program was on?
- Did the information/instruction from the program assist in job placement?
- Have you started a business?

b. Grantees

Currently there is nothing in place to measure whether TCIG has accomplished one of its main goals – empowering grantees to build their capacity and acquire other grant opportunities. OVP should have a long-term plan to follow up with past grantees to inquire if they are continuing their programs, have continued collaborative relationships that were developed through TCIG, or have obtained other grants.

6. Independent Analysis

The collaborative presentation by OVP and GovLabPHL is self-reporting which raises questions about the validity of actual success. As described above, survey questions appear slanted, and data misrepresented. Evaluations should be done by an outside agency who evaluates the entire process. Such an agency should look at how the program was launched, whether it meets metrics, customer satisfaction (of both grantees and participants), whether it had the intended impact, and whether it got more at-risk youth involved. Numerous higher-education bodies in the city would likely be interested in supporting this initiative.

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