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CONGRESSIONAL TESTIMONY

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Homeland Security of the United States House of Representatives**

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**“The Youth PROMISE Act: Outside the Scope and Expertise of the Federal
Government”**

Introduction

My name is David Muhlhausen. I am Senior Policy Analyst in the Center for Data Analysis at The Heritage Foundation. I thank Chairman Bobby Scott, Ranking Member Louie Gohmert, and the rest of the committee for the opportunity to testify today on the Youth PROMISE Act (H.R. 1064). The views I express in this testimony are my own and should not be construed as representing any official position of The Heritage Foundation.

Congress’s desire to weigh in on preventing juvenile delinquency and gang activity is easy to understand. In 2007, the Federal Bureau of Investigation reported over 1.2 million arrests of juveniles for various crimes.¹ The Bureau of Justice Statistics estimates that the total cost of federal, state, and local criminal justice systems was over \$214 billion in 2006.² However well-intentioned, the Youth PROMISE Act will expand the national government’s role in preventing crime into what has been the traditional realm of state and local governments.

Federalism Concerns

To address the prevention of delinquency and criminal gang activity appropriately, the national government should limit itself to handling tasks that are within its constitutionally designed sphere and that state and local governments cannot perform by themselves. The tendency to search for a solution at the national level is misguided and

problematic. Juvenile delinquents and criminal gangs are a problem common to all states, but the crimes that they commit are almost entirely and inherently local in nature and regulated by state criminal law, law enforcement, and courts. For example, despite the fact that thefts by juveniles occur in all states does not mean that these thefts are a problem requiring action by the national government.

When Congress creates grant programs, it generally claims to do so based on its power under the Commerce Clause of Article I, Section 8 of the Constitution. Under a very broad interpretation of the Commerce Clause, proponents of the usurpation of state and local responsibilities by the national government argue that the activity being targeted by Congress has some sort of effect on interstate commerce. For example, despite the theoretical assertion that a theft by a juvenile could potentially involve interstate commerce does not mean that juvenile thefts need to be prevented by national government. State and local agencies are responsible for preventing, investigating, and prosecuting such crimes.

Increasing the national government's involvement in delinquency and gang prevention is detrimental to quintessential federal responsibilities. Establishing grant programs that subsidize the routine responsibilities of state and local governments is a misuse of federal resources and a distraction from true national concerns. By increasing the federal role in traditional state and local responsibilities, Congress needlessly drains federal resources that should be used for more urgent priorities, such as pursuing foreign spies, combating counterfeiting, fighting international terrorism, and improving homeland security.

Out-of-Control Spending

While the goal of preventing juvenile delinquency and gang crime is admirable, the Youth PROMISE Act, if enacted, will continue Congress's march toward fiscal insolvency. The Congressional Budget Office (CBO) recently warned Congress, again, that the trajectory of the federal budget is on an unsustainable course.³ For fiscal years 2009 and 2010, the federal government will reach the largest deficits—annual budget short falls—as a share of gross domestic product (GDP) since the close of World War II.⁴ The national debt—the sum of all previous deficits—is set to reach 60 percent of GDP by the end of fiscal year 2010.⁵ The CBO warns that these “Large budget deficits would reduce national savings, leading to more borrowing from abroad and less domestic investment, which in turn would depress economic growth in the United States. Over time, the accumulation of debt would seriously harm the economy.”⁶

While the deficit and debt is driven largely by entitlement spending—Medicare, Medicaid, and Social Security—the proposed spending by the Youth PROMISE Act and all other new programs being advocated in Congress only move the nation closer to fiscal insolvency. Not including “such sums as necessary” authorizations for the PROMISE Implementation Grants (Section 215) and “Mynisha's Law” (Section 505), the five-year cost of the Act is just shy of \$1.3 billion from fiscal years 2010 to 2014. However, the version of the Youth PROMISE Act from the 110th Congress (H.R. 3864) set the budget authority for the Implementation Grants at \$2 billion per year. Therefore, a more credible estimate of the cost of the act is \$1.3 billion from fiscal years 2010 to 2014. This

estimate does not include the cost of “Mynisha’s Law” that funds Comprehensive gang Prevention and Relief Areas.

Youth-Oriented Policing Services

The Youth PROMISE Act would also create the Youth-Oriented Policing Services (YOPS)—a new federal entitlement program for state and local law enforcement agencies to be administered by the Community Oriented Policing Services (COPS) program. The Act would authorize \$100 million per year for COPS to subsidize the salaries of police officers who work with youth.

The YOPS grants are problematic for several reasons. First, YOPS grants are of questionable constitutionality because these grants would fund the routine, day-to-day operations of state and local law enforcement. When Congress subsidizes local law enforcement in this manner, it effectively reassigns to the federal government the powers and responsibilities that fall squarely within the expertise, historical control, and constitutional authority of state and local governments.⁷ The responsibility to combat ordinary crime at the local level belongs wholly, if not exclusively, to state and local governments.

Second, the grants are redundant. The original COPS grants that subsidize the salaries of police officers can already be used for youth-focused police officers. Creating a new multi-million dollar grant program to duplicate what a current grant program already performs is wasteful and unnecessary.

Third, federal grants for local salaries cause long-term dependence and budgetary problems for local governments. The YOPS grants do not have a local matching requirement. YOPS grants appear to be intended to pay for 100 percent of officer salaries over 4 years. Similar grant programs have traditionally required local matches of 25 percent. In addition, the YOPS grants do not require grantees to retain funded positions after the federal funding expires. The lack of a matching and retention requirements means that state and local governments will be less inclined to self-finance grant-funded positions in the future. After these grants expire, locals are left with budgetary holes that encourage them to lobby Congress for more grants. This cycle for dependence only drives up our national debt.

Last, research has shown that the COPS program failed to reach its intended goal of adding 100,000 additional police officers and was ineffective in reducing crime.⁸ The grants were intended to supplement law enforcement funding to allow the placement of additional officers on the streets. Instead, the COPS program has encouraged inefficient use of resources as local agencies have grown dependent on the grants for their routine operations—something for which the grants were not intended.

Importance of Rigorous, Scientific Evaluations

The principal reason for the existence of delinquency and gang prevention programs, obviously, is to prevent delinquency and gang activity. Scientifically rigorous impact evaluations are necessary to determine whether these programs actually produce their

intended effects. Obviously, there is little merit in the continuation of programs that fail to ameliorate their targeted social problems.

Estimating the impact of programs cannot be made with 100 percent certainty, but with varying degrees of confidence. Thus, impact evaluations face formidable control problems that make successful impact estimates difficult. As a general rule, the more rigorous the research methodology, the more confident we can be of the validity of the evaluation's findings.

Determining the impact of social programs requires comparing the conditions of those who had received assistance with the conditions of an equivalent group that did not experience the intervention. However, evaluations differ by the quality of their methodology to separate out the net impact of programs from other factors that may provide the real explanation for differences in outcomes for comparison and intervention groups.

Broadly speaking, there are three types of research designs: experimental designs, quasi-experimental designs, and nonexperimental designs.⁹ Experimental evaluations that use the random assignment of individuals to the intervention and control groups represent the "gold standard" of evaluation designs. Random assignment helps ensure that the control group is equivalent to the intervention group. Equivalence means that the intervention and control groups have the same composition, predispositions, and experiences.¹⁰ Experimental evaluations are considered to be superior to quasi-experimental and nonexperimental evaluations.

Randomized evaluations ensure that pre-program differences between the intervention and control groups do not confound or obscure the true impact of the programs being evaluated. Random assignment allows the evaluator to test for differences between the experimental and control groups that are due to the intervention and not to pre-intervention discrepancies between the groups. By drawing members of the intervention and comparison groups from the same source of eligible participants, these experimental evaluations are superior to other evaluations using weaker designs.¹¹

Under quasi-experimental designs, the intervention and comparison groups are formed by a procedure other than random assignment. Quasi-experiments frequently employ methodological and statistical techniques to minimize the differences between intervention and comparison groups that influence the outcomes being measured. This design frequently matches intervention and comparison group members together based on factors thought to influence program impacts.

Similar to quasi-experiments, nonexperimental designs use statistical methods to isolate the effects of the intervention by attempting to make the intervention and comparison groups as equivalent as possible. Nonexperimental designs often employ multiple regression analysis to isolate the effect of the intervention.

In both quasi-experimental and non-experimental designs, failure to remove the influence of differences that affect program outcomes may mean that the net impact of the intervention may not be actually due to the program, but caused by the underlying differences between the groups. While quasi-experimental and non-experimental designs use sophisticated techniques, experimental evaluations are still considered to produce more reliable estimates of program effects.

Overstating Effectiveness. After conducting a meta-analysis of 308 criminal justice program evaluations, Professor David Weisburd of George Mason University and his colleagues found that weaker evaluation designs are more likely to find favorable intervention effects and less likely to find harmful intervention effects.¹² Given that experimental evaluations produce the most reliable results, this finding has important ramifications for the types of evaluations that should be funded by the Youth PROMISE Act. Professor Weisburd and his colleagues caution that quasi-experimental and nonexperimental designs, no matter how well designed, may be incapable of controlling for the factors that make individuals considered agreeable and allocated to the intervention group. Given the importance of criminal justice policy, Professor Weisburd argues that there is a moral imperative upon researchers to conduct randomized experiments.¹³ The moral imperative is derived from the “obligation to provide valid answers to questions about the effectiveness of treatments, practices, and programs.”¹⁴ In my view, this moral imperative also applies to Congress which spends billions of dollars to subsidize state and local government criminal justice programs. Congress has infrequently supported the experimental evaluation of the grant programs it funds.

Not Enough Evaluation. The promotion of impact evaluations in the Youth PROMISE Act is admirable. However, the Act’s evaluation provisions need to be strengthened to help ensure that evidence-based policies are truly funded. The evaluations of prevention programs funded under the Innovative Crime and Delinquency Prevention and Intervention Strategy Grants (Title VI, Section 605) will likely take place under ideal circumstances. The prevention programs evaluated under Section 605 will likely be model programs that are run by highly training professionals operating under optimal conditions. Thus, these evaluations will tell practitioners and policymakers little about how prevention programs perform in the real world. For this reason, it is paramount that the evaluation provisions for the Promise Implementation Grants be strengthened.

The PROMISE Implementation Grants, the primary grant program created by the Act, does not require each grantee to perform scientifically rigorous impact evaluations. Subject to funding availability, Section 223 of Title II only requires some impact evaluations be performed of PROMISE Implementation Grant programs. Under the PROMISE Assessment and Planning Grants, the Coordinating Councils are mandated to perform needs assessments to determine the degree of social problems that exist in their communities and what services, if needed, should be provided. The councils should also be required to evaluate the impact of their programs with rigorous scientific methods.

As presently written, Section 223 will evaluate only a small share of all the programs funded by the PROMISE Implementation Grants. This lack of comprehensive evaluation

means that policymakers will have little knowledge of the effectiveness of the majority of Implementation Grant programs. To resolve this problem, Section 223 should require that Coordinating Councils perform scientifically rigorous impact evaluations of all the programs they oversee. As an incentive, those Coordinating Councils utilizing experimental impact evaluations should receive additional funding compared to other councils that use less reliable evaluation designs. The requirement under Section 213 that grant renewal decisions by the administrator of the Office of Juvenile Justice and Delinquency Prevention (OJJDP) consider the results of the Section 223 evaluations make little sense without requiring that all Implementation Grant programs undergo impact evaluations in the first place.

Avoiding Crucial Prevention Outcomes. Too frequently, delinquency and gang prevention advocates measure a program's "intermediate outcomes" instead of how well it prevents delinquent behavior.¹⁵ For example, the Office of Juvenile Justice and Delinquency Prevention (OJJDP) sponsored a book-length report, *Serious and Violent Juvenile Offenders: Risk Factors and Successful Interventions*, identifying successful delinquency intervention programs.¹⁶ Of the 56 "successful" delinquency prevention evaluations presented, only nine measured whether official acts of delinquency (for example, criminal arrests) were prevented.¹⁷ None of these evaluations used experimental designs. Most of the studies measured intermediate outcomes—perhaps a teacher's perception that a juvenile's behavior in school had improved. If that juvenile had committed a crime after going through the program, however, that intermediate outcome of better school behavior would matter little to society. Similarly, a rehabilitation program offered in a correctional setting would never be deemed effective based on intermediate effects, such as attitudinal changes. In corrections, the bottom line is recidivism. For delinquency and gang prevention programs, tracking distal (long-term) outcomes, such as official acts of delinquency and gang membership, are better measures of crime prevention than intermediate effects.

To properly ensure that the Youth PROMISE Act promotes evidence-based policies, all impacted evaluations funded by the Act should use crime-related distal outcome measures. Distal outcomes for impact evaluations of delinquency and gang prevention programs would include such measures as official arrests, substance abuse, and gang membership. Impact evaluations relying solely on intermediate outcomes tell us little about program effectiveness.

Problem of Replication

Policymakers should not assume that the prevention programs funded by PROMISE Implementation Grants will yield the same positive outcomes as programs previously found to be effective. Delinquency prevention programs that have been deemed "effective" and serve as "model" programs have often been implemented under optimal conditions. These programs have been comprised of highly trained professionals operating under ideal conditions. In addition, the conditions under which these programs operate are carefully monitored to make certain that the youth receive the intended level of treatment. In the real world, program conditions are often quite less than optimal.

The success of replicating “evidence-based” programs often depends on implementation fidelity—the degree to which programs follow the theory underpinning the program and how successfully program components are correctly put into practice. A lack of implementation fidelity is often the reason why previously “successful” or “model” programs fail to be effective when put into action in other jurisdictions.

A good example of a “successful” program that has not been found to be effective when replicated in the real world is Reconnecting Youth, a school-based substance abuse program. Reconnecting Youth was designated as a “model program” by the Substance Abuse and Mental Health Services Agency (SAMSHA)¹⁸ and as a “research-based” program by the National Institute on Drug Abuse.¹⁹ As acknowledged by Dr. Denise Hallfors, a Senior Research Scientist at the Pacific Institute for Research and Evaluation, and her colleagues, these classifications are important because schools receiving Safe and Drug-Free Schools and Communities grants under the No Child Left Behind Act of 2001 are mandated to select drug prevention programs that have been previously designated as effective.²⁰

Dr. Denise Hallfors and her colleagues evaluated the effectiveness of Reconnecting Youth under real-world conditions.²¹ In a random experiment, 1,370 high-risk youths in nine high schools in two large urban school districts were assigned to intervention and control groups. Overall, Reconnecting Youth had no effect on such measures as academic performance, truancy, and substance abuse. However, the outcome measures for Reconnecting Youth participants showed statistically significant decreases in conventional peer bonding and pro-social weekend activities (for example, doing homework, club or church activities, and family activities) and a statistically significant increase in high-risk peer bonding.²² Dr. Denise Hallfors and her colleagues concluded that “Reconnecting Youth failed to meet the requirement to do more good than harm.”²³ Further, programs found to be effective in a single location “do not provide adequate evidence for widespread dissemination or designation as ‘model’ programs.”²⁴

Another example is California’s Juvenile Crime Enforcement and Accountability Challenge Grant program (hereinafter referred to as “Challenge Grants”). Created in 1996, the Challenge Grants were awarded on a competitive basis to 16 California counties. The Challenge Grant counties created Coordination Councils, similar to the councils proposed under the Youth PROMISE Act, that would implement “successful” programs based on OJJDP’s *Comprehensive Strategy for Serious, Violent and Chronic Juvenile Offenders*.²⁵ Comparing Challenge Grant counties to nonfunded counties from 1989 to 2000, Professor John L. Worrall of the University of Texas at Dallas found that the grants were “associated with virtually no overall decline in juvenile arrests.”²⁶

*The Politics and Implementation of Intergovernmental Grants.*²⁷ Proponents of the Youth PROMISE Act should not expect that the Implementation Grants will yield the same positive outcomes as “evidence-based” programs. If the Implementation Grants are funded at \$2 billion per year, then the sheer number of grants awarded by OJJDP will likely mean that award decisions will be based on a common denominator. As a result, the number of mediocre programs will vastly outnumber the number of exceptional

programs receiving funding. In addition, the Office of Justice Programs has had difficulty in monitoring and evaluating grant-funded programs to ensure that the funding is not being wasted.²⁸

Pressure to award funds as quickly and to as many congressional districts as possible will typically introduce severe administrative problems.²⁹ Constituent politics are particularly prevalent in intergovernmental grants. Grant-making bureaus, like OJJDP, and grant-seekers have a mutually dependent relationship. Grant-seekers want funds, while grant-making bureaus need the political support of the grantees during the appropriation and reauthorization processes.

Professor R. Douglas Arnold of Princeton University states that while legislators and bureaucrats are independent decision makers, “each has authority to make certain decisions without consulting the other, [and] each generally finds it in his own self-interest to consider the other’s preferences.”³⁰ Budget security and growth, as pursued by bureaucrats, depends on congressional decisions. Thus, a bureaucracy will generally allocate benefits, especially grants, in a manner that will maintain and expand coalitions that support the bureaucracy.

Likewise, legislators seeking to spend the largest possible shares of federal grants on their constituents depend on bureaucrats to implement this spending.³¹ Congress, in turn, can exert some influence over program administrators’ decisions through annual appropriations. As a result of this two-way interaction, “[b]oth congressmen and bureaucrats tend to adjust their decisions to accommodate each others’ preferences whenever they believe it might help them achieve their own goals.”³² Thus, the strategies that grant-making bureaus use to administer grants respond to the desires of elected officials and their constituents.

The mutually dependent relationship between grant-makers and grant-seekers, facilitated by congressional overseers, produces incentives that can interfere with the implementation and oversight of intergovernmental grants. Providing constituents with easy access to federal funding is often more important than actually promoting effective policies. There is no provision within the Youth PROMISE Act that can prevent the harm caused by the interplay between politics and the intergovernmental grants.

Review of Delinquency and Gang Prevention Programs

This section reviews the scientific evidence regarding the effectiveness of some delinquency and gang prevention programs.

Delinquency Prevention Programs. Multisystemic therapy (MST) has shown promise in reducing the delinquency of youth displaying serious antisocial behavior. A highly intensive and tailored counseling program aimed at individuals, not groups, MST recognizes that antisocial behavior is influenced by three areas where youth interact: family, school, and peer associations.³³ Highly trained MST counselors work with parents, usually in the home, to improve discipline, enhance family relationships, increase youth interactions with pro-social peers, and improve school performance.³⁴

Several randomized experiments of MST run by its developers have linked MST to reductions in offending by participants.³⁵ There is some debate about whether MST is a truly effective program and can be replicated successfully across the nation. Professor Julia H. Littell of Bryn Mawr College and her colleagues have pointed out that some of MST experimental evaluations have suffered from attrition where subjects in the evaluation dropped out of treatment. Evaluations, even random experiments, that exclude dropouts from the assessment of outcomes may inadvertently engage in “creaming of the crop”—where the intervention group is composed of individuals most likely to succeed and those least likely to succeed dropping out. Attrition of this nature will cause the intervention and control groups to no longer be equivalent, thus biasing the impact estimates. When MST was replicated in Ontario, Canada, an experimental evaluation of MST included intervention dropouts in the final outcome measures.³⁶ The evaluation, unbiased by attrition, found that MST failed to reduce delinquency.³⁷ In addition, MST was replicated in Norway and found to be effective based on intermediate measures, but delinquency was not measured.³⁸

After conducting a meta-analysis of MST, Professor Julia H. Littell of Bryn Mawr College and her colleagues conclude that “it is not clear whether MST has clinically significant advantages over other services.”³⁹ While the debate over the effectiveness of MST has yet to be settled, very few prevention programs have undergone such thorough scrutiny and still appear to be promising programs.

Gang Prevention. There is little known about the effectiveness of gang prevention programs because so few have undergone impact evaluations, let alone evaluations using experimental designs. A leading theory of preventing gang formation, opportunity provisions, contends that youth will join gangs when they lack legitimate opportunities in the labor market. Thus, employment, job training, and educational opportunities should be offered as alternatives to gang membership.⁴⁰

Hendrick Fisher, a Researcher at the Centre for Evidence-Based Interventions, and her colleagues attempted to conduct a meta-analysis of gang programs using the opportunity provisions approach.⁴¹ They failed to identify any experimental evaluations of opportunity provisions gang prevention programs. Other studies using other evaluation designs had substantial methodological flaws that rendered their results useless.

Using a different approach, the Gang Resistance Education and Training (G.R.E.A.T.) is a school-based gang-prevention program that receives popular support from Congress. G.R.E.A.T. is an offshoot of the ineffective Drug Abuse Resistance Education (D.A.R.E.) program.⁴² G.R.E.A.T. uses uniformed police officers as instructors in middle school classrooms to teach about the negative consequences of gang participation.⁴³

G.R.E.A.T. appears to be successful when intermediate effects are used to measure effectiveness. In a national quasi-experimental evaluation of G.R.E.A.T., the program was found to be associated with declines in student-reported victimization and risk seeking and increases in the negative perception of gangs, favorable attitudes toward

police, and pro-social peer affiliations.⁴⁴ However, these intermediate effects are not as important as reducing gang membership and criminal activity—the ultimate goals of any gang-prevention program.

The same national evaluation found that G.R.E.A.T. did not have any statistically significant impact on gang membership, drug use, and total self-reported delinquency.⁴⁵ Despite these underwhelming results, the program retains popular support in Congress. Commenting on G.R.E.A.T., Professors Malcom W. Klein of the University of Southern California and Cheryl L. Maxson of the University of California, Irvine, conclude that the program, which “was modeled on a failed program with a positive image is, itself, a study in the application of conventional wisdom in the face of contrary empirical knowledge.”⁴⁶ The inclusion of G.R.E.A.T. under the Interagency Gang Prevention Task Force (Title V, Section 504) is at odds with the notion that the Youth PROMISE Act is intended to fund “evidence-based” programs.

A first step in preventing gang membership is preventing delinquency. To prevent gang membership, state and local officials should consider experimenting with delinquency prevention programs that have been rigorously evaluated and, at least, have some record of success at reducing delinquency. Juveniles with a history of delinquency are more likely to join gangs and, once in the gang, to engage in higher rates of criminal activity than they would have otherwise.⁴⁷ While the debate over the merits of MST is unresolved, the program may have potential as a gang prevention program targeting high-risk youth.

Causing More Harm than Good

The late Joan McCord, a professor of criminology at Temple University and a former president of the American Society of Criminology, cautioned researchers, practitioners, and policymakers that crime prevention programs can sometimes cause more harm than good.⁴⁸ For example, the Cambridge-Somerville Youth Study was a well-executed program that attempted to prevent the delinquency of juvenile males. Undergoing an experimental evaluation, the intervention group received frequent home visits by counselors for an average of five and a half years.⁴⁹ Those who received the well-intentioned treatment were more likely to have been convicted of serious crimes.⁵⁰ In addition, the treatment group died an average of five years younger and was more likely to be medically diagnosed with alcoholism, schizophrenia, and manic depression.⁵¹ More alarming, the adverse effects increased as the intensity and duration of the treatment increased.⁵²

Another example is a group interaction training program that attempted to improve the social skills of students in Chicago public schools during the early 1980s. The program was found to increase the misbehavior and delinquency of a high school student after undergoing an experimental evaluation.⁵³

While Professor McCord focused on crime prevention programs, other programs have had negative effects as well. For example, the national randomized evaluation of Job Training Partnership Act (JTPA) found that disadvantaged male youth without criminal

histories had higher arrest rates after participation in job training than similarly disadvantaged youth who did not participate in the services.⁵⁴

Conclusion

While crime and juvenile delinquency policy should be evidence-based, these policies should be implemented under the appropriate level of government. Presently, most of the policies authorized by the Youth PROMISE Act do not fall under the responsibility of the federal government. For example, the PROMISE Assessment and Planning Grants and the Implementation Grants subsidize the routine responsibilities of state and local governments. While juvenile delinquency and gang crime are common to all states, these crimes are almost entirely and inherently local in nature. Therefore, the prevention of delinquency and gang crime is the responsibility of state and local governments.

YOPS grants are not only duplicative and wasteful, but are based on the ineffective COPS hiring grants that cause long-term dependence on the federal government and budgetary problems for local governments.

While the Act's focus on promoting "evidence-based" prevention programs is sensible, there is not enough emphasis on evaluating programs implemented in the real world. Policymakers should not assume that grants from Washington, D.C., to replicate "evidence-based" programs will yield the same positive outcomes as programs previously found effective. Replicating programs that were implemented under optimal circumstances is less likely to have the same positive results in the real world.

Too often, the focus of Congress and grant-making bureaus is the easy and wide dissemination of grants to constituents. As a result, the number of mediocre programs funded under the Youth PROMISE Act will vastly outnumber the number of exceptional programs receiving funding. In addition, the Office of Justice Programs has had difficulty in monitoring and evaluating grant-funded programs to ensure that the funding is not being wasted.

Congress should contemplate the fact that government's intervening in the lives of youth can cause more harm than good. For the above reasons, the Youth PROMISE Act is unlikely to have a significant impact on preventing delinquency and gang crime.

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¹Federal Bureau of Investigation, Table 32: Ten-Year Arrest Trends Totals, 1998–2007, at http://www.fbi.gov/ucr/cius2007/data/table_32.html (July 12, 2009).

²Bureau of Justice Statistics, “Direct Expenditure by Level of Government, 1982-2006,” at <http://www.ojp.usdoj.gov/bjs/glance/tables/expgovtab.htm> (July 12, 2006).

³Congressional Budget Office, “The Long-Term Budget Outlook,” June 2009, at <http://www.cbo.gov/ftpdocs/102xx/doc10297/06-25-LTBO.pdf> (July 8, 2009).

⁴*Ibid.*, p. xii.

⁵*Ibid.*

⁶*Ibid.*

⁷David B. Muhlhausen and Brian Walsh, “COPS Reform: Why Congress Can't Make the COPS Program Work,” Heritage Foundation *Background* No. 2188, September 26, 2008, at <http://www.heritage.org/Research/Crime/bg2188.cfm>, and David B. Muhlhausen and Erica Little, “Federal Law Enforcement Grants and Crime Rates: No Connection Except for Waste and Abuse,” Heritage Foundation *Background* No. 2015, March 14, 2007, at <http://www.heritage.org/Research/Crime/bg2015.cfm>.

⁸See David B. Muhlhausen, “Impact Evaluation of COPS Grants in Large Cities,” Heritage Foundation *Center for Data Analysis Report* No. CDA06–03, May 26, 2006, at <http://www.heritage.org/Research/Crime/cda06-03.cfm>; David B. Muhlhausen, “Do Community Oriented Policing Services Grants Affect Violent Crime Rates?” Heritage Foundation *Center for Data Analysis Report* No. CDA01–05, May 25, 2001, at <http://www.heritage.org/Research/Crime/CDA01-05.cfm>; and John L. Worrall and Tomislav V. Kovandzic, “COPS Grants and Crime Revisited,” *Criminology*, Vol. 45, No. 1 (February 2007), pp. 159–190.

⁹William R. Shadish, Thomas D. Cook, and Donald T. Campbell, *Experimental and Quasi-Experimental Designs for Generalized Causal Inference* (Boston: Houghton Mifflin Company, 2002). A fourth research design is the natural experiment. Natural experiments utilize naturally occurring differences between intervention and comparison groups. The author does not know of any examples of natural experiments used to evaluate delinquency and gang prevention programs, so this design is not covered in this testimony.

¹⁰Peter H. Rossi, Mark W. Lipsey, and Howard E. Freeman, *Evaluation: A Systematic Approach*, 7th edition (Thousand Oaks, Cal.: SAGE Publications, 2004).

¹¹Randomized evaluations ensure that pre-program differences between the intervention and control groups do not confound or obscure the true impact of the programs being evaluated. Random assignment allows the evaluator to test for differences between the experimental and control groups that are due to the intervention and not to pre-intervention discrepancies between the groups. By randomly assigning members of the intervention and control groups from the same source of eligible participants, experimental evaluations are superior to other evaluations using weaker designs.

¹²David Weisburd, Cynthia M. Lum, and Anthony Petrosino, “Does Research Design Affect Study Outcomes in Criminal Justice?” *Annals of the American Academy of Political and Social Sciences*, No. 578 (November 2001), pp. 50–70.

¹³David Weisburd, “Ethical Practice and Evaluation of Interventions in Crime and Justice,” *Evaluation Review*, Vol. 27, No. 23 (June 2003), pp. 336–354.

¹⁴*Ibid.*, p. 350.

¹⁵Intermediate or proximal outcomes are outcomes that the program is expected to affect most directly and immediately. Intermediate outcomes are frequently psychological, such as attitudes and behavioral intentions, which are directly influenced by the program. Intermediate outcomes are rarely the ultimate outcomes the program wants to cause.

¹⁶Gail A. Wasserman and Laurie S. Miller, “The Prevention of Serious and Violent Juvenile Offending,” in Ralph Loeber and David P. Farrington, eds., *Serious and Violent Juvenile Offenders: Risk Factors and Successful Interventions* (Thousand Oaks, Cal.: Sage Publications, 1998), pp. 197–247.

¹⁷*Ibid.*

¹⁸Steven Schinke, Paul Brounstein, and Stephen E. Gardner, *Science-Based Prevention Programs and Principles, 2002*, DHHS Publication No. (SMA)03-3764 (Rockville, Md.: Center for Substance Abuse Prevention, Substance Abuse and Mental Health Services Administration).

¹⁹Elizabeth B. Robertson, Susan L. David, and Suman A. Rao, *Preventing Drug Use among Children and Adolescents: A Research-Based Guide for Parents, Educators, and Community Leaders*, NIH Publication No. 04-4212(A), (Washington, D.C.: National Institutes of Health, National Institute on Drug Abuse, October 2003).

²⁰Denise Hallfors, Hyunsan Cho, Victoria Sanchez, Sheren Khatapoush, Hyung Min Kim, and Daniel Bauer, “Efficacy vs Effectiveness Trial Results of an Indicated ‘Model’ Substance Abuse Program: Implications for Public Health,” *American Journal of Public Health*, Vol. 96, No. 12 (December 2006), pp. 2254–2259. For more information on the requirement, see Public Law 107-110, Title IV, Section 4001.

²¹*Ibid.*

²²*Ibid.*, p. 2257.

²³*Ibid.*, p. 2258.

²⁴*Ibid.*

²⁵Shay Bilchik, *Title V Incentive Grants for Local Delinquency Prevention Programs Report to Congress, 1996*, NCJ 165694 (Washington, D.C.: Office of Juvenile Justice and Delinquency Prevention, 1996), and John J. Wilson and James C. Howell, *Comprehensive Strategy for Serious, Violent, and Chronic Juvenile Offenders: Program Summary* (Washington, D.C.: Office of Juvenile Justice and Delinquency Prevention, December 1993).

²⁶Worrall, “Funding Collaborative Juvenile Prevention Programs,” p. 493.

²⁷This section of my testimony is based on a paper I co-authored with Brian W. Walsh. David B. Muhlhausen and Brian Walsh, “COPS Reform: Why Congress Can’t Make the COPS Program Work,” Heritage Foundation *Backgrounder* No. 2188, September 26, 2008, at <http://www.heritage.org/Research/Crime/bg2188.cfm>.

²⁸Laurie E. Ekstrand, “Office of Justice Programs: Problems with Grant Monitoring and Concerns About Evaluation Studies,” testimony before the Subcommittee on Crime, Committee on the Judiciary, U.S. House of Representatives, GAO–02–507T, March 7, 2002, at www.gao.gov/new.items/d02507t.pdf (July 12, 2009).

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