

Testimony to the Senate Homeland Security and Government Affairs
Subcommittee on Federal Financial Management, Government Information, and
International Security

June 13, 2006

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Chairman Coburn, Ranking Member Carper, members of the subcommittee: My name is Adam Hughes and I am the Director of Federal Fiscal Policy at OMB Watch — an independent, nonpartisan watchdog organization. Thank you for inviting me to testify today on what we all can agree is a crucial cause — making our government the most effective and responsive it can absolutely be.

OMB Watch was founded in the early 1980s and has spent over twenty years advocating for government accountability, transparency and access to government information, and citizen participation in governmental processes. OMB Watch believes citizens must take an active role in holding their government accountable and that the federal government, when supported by sensible fiscal policy, can develop the programs and safeguards that meet the public's needs.

This issue has taken on added importance during the Bush administration as a combination of factors, some avoidable, some not, have plunged the federal government into debt. Large and sustained deficits over the past five years have made efficient use of government resources all the more important. In light of the anticipated budget crunch due to the baby boomers retirement over the coming decades, the fiscal situation of this country will only deteriorate further. Performance measurement can therefore become a particularly attractive alternative for those who want to set federal priorities based on the current fiscal prospects of a strained and shrinking revenue base (that is, without expanding that base to fund longstanding programmatic commitments).

OMB Watch has been commenting on government performance issues for the better part of its existence. We have spent more time analyzing the Government Performance and Results Act (GPRA) and the PART over the last ten years as government itself has implemented multiple initiatives and mechanisms to attempt to gauge whether goals are being met.

We are supportive of the concept of improving federal capacity to meet the public's needs. OMB Watch has worked for over 20 years to protect and improve that capacity, and we have been open to possibility of using performance measurement as a means for achieving those ends. We bring a strong belief in the importance and potential of government itself to the work we do, and because of that belief, we want government to be responsive to community needs, spend money effectively, and accomplish its goals. We are advocates for government and therefore have a very strong self-interest in seeing government programs get results.

PART, however, is a very poor mechanism for measuring program performance and results, introducing biases and a skewed ideological perspective into a model claiming to present consistent and objective performance data and evaluations of government programs. Often times, the PART actually decreases the efficiency and effectiveness of government through increased administrative burdens, distracted managers, and compliance costs.

Ironically, the PART mechanism itself does not produce the right type of results to further support and improve government. We believe PART ratings should not be directly connected with the budgeting process of Congress because of significant deficiencies — mainly the substantial biases and limitations embedded within the tool and the additional limitations we have observed in OMB’s actual application of PART.

Based on our studies of PART and our longstanding commitment to an open, accountable government that is responsive to the public’s needs, I come to you today with three points to make:

- (1) PART continues a troubling trend we have seen in other executive branch initiatives and even congressional proposals—namely, a trend to arrogate increasing power to the White House, even in areas that by constitutional design have been committed to Congress.
- (2) PART is so limited and distorted a tool that it should be used neither for management nor for budget and appropriations decisions. Both by the design of the tool and as the mechanism is implemented, PART systematically ignores the reality of federal programs and judges them based on standards that are deeply incompatible with the purposes that federal programs are expected to serve. As one agency contact memorably explained to us, PART assessments are tantamount to a baseball coach walking to the mound to remove his pitcher and then chastising him for not kicking enough field goals as he brings in a reliever.
- (3) There is a better way. Specifically, Congress already has the means to investigate and produce far more sophisticated analyses of the usefulness, effectiveness, and results of government programs. In fact, this is one of the primary, if not *the* primary role of the legislative branch. While the oversight function of Congress may not be as robust as it once was due to significantly shorter legislative sessions and delays due to a sharply divided political climate, the capacity to judge the results of government programs already exists within the existing structures of Congress — structures that do not carry with them the significant limitations and negative consequences of the PART.

I. PART: EXAMPLE OF BROADER SHIFTS IN POWER IN GOVERNMENT

Before I discuss some of the specific weaknesses and negative consequences of the PART, I want to point out a larger trend in government over the last few years that we believe PART is connected to. Since the Bush administration came into office and after the terrorist attacks in September 2001, we have seen a steady shifting of power to the executive branch in many different facets of our government — particularly security and military policy.

Yet this larger trend toward increased executive power has spilled over into other areas outside security and defense. Some of the “budget process” changes currently being considered by Congress also have a tendency to consolidate yet more power in the White House. Specifically, the president's enhanced recession proposal scheduled for debate this month in Congress and a proposal to establish sunset commissions gaining traction in the House are indicative of this larger trend by allowing the President increased power over spending priorities and program authorizations—activities that are the proper domain of Congress. These proposals represent a disturbing trend.

In some ways PART is even worse than those proposals for two distinct reasons. First, PART is more insidious: whereas the other proposals openly seek to arrogate power to the White House, PART portrays itself as an unbiased evaluator of results and performance while serving the White House's political priorities. As I will discuss today, PART is anything but an even-keeled evaluator of government programs.

Second, the White House is using PART to supplant Congress's role and even to contravene long-settled Supreme Court precedent. By instituting the president's or OMB's subjective policy preferences and biases for those of the other branches of government, the PART is a seemingly innocuous tool for the executive to manipulate the balance of power across all of the federal government and remove some of the checks and balances that are an integral part of our representative political system. For this reason alone, PART should be approached extremely cautiously by those outside the administration.

II. TWO TYPES OF BIASES LEAD TO FLAWED TOOL

I would like to focus on two main aspects of the biases inherent in PART. I believe these biases are significant and numerous enough to discredit the PART from being heavily or directly involved with both budget requests and appropriations and also management of programs.

Both by the design of the tool and as the mechanism is implemented, PART systematically ignores the reality of federal programs and judges them based on standards that are deeply incompatible with the purposes that federal programs are expected to serve. As one agency contact memorably explained to us, PART assessments are tantamount to a baseball coach walking to the mound to remove his pitcher and then chastising him for not kicking enough field goals as he brings in a new pitcher.

A. STRUCTURAL BIASES EMBEDDED IN TOOL DESIGN

1. Overly Simplistic Model Fails to Capture Diversity, Complexity, and Possibilities of the Federal Government

The intricacies of the federal legislative process, the necessity of crafting coalitions to pass legislation, and the shifting face of congressional representation often lead Congress to create and later amend a wide diversity of federal programs with multiple, and at times conflicting, goals. The PART tool — because of its crude design and over-simplified rating system — is not robust enough to capture the complexity inherent in the federal government.

First and foremost, the black and white rating scale (ranging from effective to ineffective) ignores the multiple and diverging reasons a program could be succeeding or failing. Different programs have different problems for different reasons. Perhaps a program is struggling to achieve its mission because it is underfunded and an ineffective program deserves more resources. The PART ratings are unable to convey such complexity.

The one-size-fits-all approach of the PART review process often minimizes or ignores important differences in purpose and design between varying types of government programs, possible intentionally overlapping goals between programs and departments, and even multiple goals Congress has charged a single program with achieving.

Social problems are complex and diverse, and federal programs must accordingly take many shapes, attempt many approaches, and address a wide range of needs. The assumptions embedded in the very design of PART—that all that can be meaningfully known about programs is quantifiable; that programs have a single, unitary purpose that never adjusts to changing circumstances; that the only meaningful work performed by federal programs leads to a single outcome—are short-sighted assumptions that embody a narrow and simplistic vision of the role of government. It is simply too crude to serve as a useful guide for government management.

Perhaps the most obvious failure of the tool in this regard is its narrow insistence on outcome measures as the benchmark of programmatic success. The outcome measurement straightjacket is problematic because it is inadequate to the task of informing the management of programs that can only be measured in terms of outputs or that are difficult to measure in terms of either outputs or outcomes. This blind adherence to outcome measures in the tool design fails to accommodate some very important types of programs. For example:

- Multiple programs with varying approaches to the same problem, block grants, competitive grants, and demonstration grants are all ways to experiment with solutions to complex social problems. Grants to state and local governments, for example, attempt to take advantage of the fabled “laboratories of democracy” to experiment with ways to attack persistent and often intractable social problems. For some issues, such as foster care, Congress has decided that multiple programs in multiple agencies and departments — including the Title IV-E entitlement, the Adoption Assistance program, the Chafee Independence Living Program grants, Medicaid, special education services, and more — are needed to meet the needs of abused and neglected children. PART’s rigid criteria for uniqueness and unitary performance goals ignore the value of multiplicity and overlap and create perverse incentives to recentralize in the federal government what Congress has decided to shift to the states.
- Research programs, such as the National Toxicology Program and the IRIS database, are intended to close gaps in our knowledge rather than lead to immediately measurable outcomes such as reduced incidence of cancer or decreases in lifetime fatality risks from exposure to toxic substances. In these cases, improvements in what we know and what we can reasonably determine are valuable in and of themselves, not because they lead to other measurable consequences. The PART tool fails to recognize the value in pure research programs and the like; not only does PART therefore fail to

offer anything of value to the management of such programs, but it also threatens to lead to reduced funding and distorted priorities for no justifiable reason.

- Research programs are the canary in the coalmine for another limitation of the tool: its bias for short-term impacts rather than long-term efforts. Every EPA research program PARTed as of the FY06 budget was assessed as “Results Not Demonstrated,” (RND) based on rationales that are deeply incompatible with the purposes of those programs. OMB criticized these programs for failing to link their research activities with the accomplishment of outcomes, but such criticism is willfully blind to the very nature and benefits of research: often we can learn as much from failure as from any success. This bias is built into the design of the tool itself, according to a member of EPA’s Science Advisory Board, who testified “it appears that the weighting formula in the PART favors programs with near-term benefits at the expense of programs with long-term benefits. Since research inevitably involves more long-term benefits and fewer short-term benefits, PART ratings serve to bias the decision-making process against programs such as STAR ecosystem research, global climate change research, and other important subjects.”¹
- Many programs are created to address concerns that are broader and deeper than PART, with its insistence on quantifiable outcome measures, can begin to accommodate. The Americorps National Civilian Conservation Corps, for example strives to achieve the goals of “strengthening communities” and “increasing civic responsibility.” It is not possible to establish quantifiable measures of community strength, but that impossibility does not mean that the communities themselves cannot attest to their strength. In such cases, the real measure of success will have to be subjective and narrative — and must include outside stakeholder input in order to balance competing perspectives and viewpoints. PART contains no avenues for stakeholder input into the program review process. Using PART as a management guide will threaten such programs and lead to a government that has no vision and fails to embody the public’s most cherished values.

A management tool that disapproves of visionary, values-driven, future-oriented, or knowledge-creating programs is a tool for mismanagement, which would detract from what a federal government is uniquely situated to do.

2. PART Creates Increased Management, Compliance, and Data Burdens

Over the years since the PART was first introduced, the review process has often forced program managers and agencies to alter their existing management and performance review practices, institute new and costly data collection structures and systems, generate independent reviews and analyses from outside the government and overlay this performance initiative with previous government efforts. These alterations to program management have created an entire compliance system within itself that distracts energy and resources from achieving program goals.

¹ Testimony of Dr. Genevieve Matanoski, EPA Science Advisory Board, before Subcomm. on Environment, Technology, and Standards, House Comm. on Science, Mar. 11, 2004, *available at* 2004 WL 506081.

PART often conflicts or complicates other government wide reform initiatives. Collecting new types of data within agencies for OMB in order to comply with the PART rating system is often constrained by the Paperwork Reduction Act, which requires agencies to reduce the number of data elements collected. Further, the PART and the Government Performance and Results Act (GPRA), which attempts to develop strategic goals and department and government cross-cutting comparison for the federal government through a much more open and accessible process than the PART mechanism, are often in conflict with each other, creating added management difficulties and increased compliance burden within agencies.

Furthermore, there are significant obstacles to the data collection that PART demands. Agency data collection is constrained by the Paperwork Reduction Act, which requires agencies to obtain OMB approval before conducting any information collection that asks the same questions of ten or more people. Additionally, data collection efforts, especially the independent evaluations PART expects programs to rely on, can be expensive, but PART does not excuse programs that cannot collect the expected level of data because of a lack of funding. OMB itself is responsible for these obstacles, even as it penalizes programs for running into them.

Between this Catch-22 and the sometimes absurd mismatch of PART measures and actual program purposes, program staff have learned to treat PART as a compliance exercise instead of a guide to better management. OMB Watch has conducted extensive, in-depth interviews with agency staff involved in PART assessments at the program level. We have heard repeatedly that agency staff have spent considerable time “gaming” the PART system—learning the pressure points and pitfalls to avoid negative scores and consequences. A performance appraisal system so widely regarded as a mere compliance exercise offers little diagnostic benefit for agency program managers and is another indication PART scores should not be related to budget allocations for programs.

3. PART's Bias Toward Specific Program Types

The extreme biases against block grant programs within the PART process are perhaps the most egregious and the most obvious example of the problems embedded in the very design of the tool.

Programs that operate through grants, whether competitive grants or block grants, are rated lower on average than all other programs. When OMB rated block/formula grant programs (a category that includes both block grants and entitlements) in FY 2005 process, it found no block/formula grant programs were “effective” while finding 11 percent of programs in general were “effective.” In addition, OMB found 43 percent of block/formula grant programs to be ineffective while determining only 5 percent of programs overall were “ineffective.”

The chart below compares the overall breakdown of PART scores in competitive grant programs, block grant programs, and all other programs after the reviews were completed for FY 2006. As is evident, grant programs rate significantly lower in PART reviews than all other programs on average. Further, of the programs rated “ineffective” that were zeroed out completely in the president's FY 2006 budget, 89 percent were competitive or block/formula grants.

Comparison of Grant Programs and All Other Programs in PART (percentage of programs rated in each category)			
	Competitive Grant	Block Grant	All Other Programs
Effective or Moderately Effective	24%	27%	49%
Adequate or Ineffective	36%	36%	26%
Results Not Demonstrated	40%	37%	25%

There is an easy explanation for this trend. Federal grant programs largely send money to the state and local governments, a system established intentionally by Congress because they have realized that in some instances it is vastly more efficient to allow individual states the flexibility to tailor their respective programs and initiatives to suit local and regional needs. Some, like the Community Development Block Grant, are particularly important to improving the economies of poor and rural communities across the country with locally designed projects and programs that address specific community needs. Entitlements, meanwhile, will always fail the PART's demand for linkages between performance goals and revenue allocation, because entitlements are automatic distributions to entitled populations — in other words, PART scores them negatively for being exactly what Congress intended them to be.

The odds are stacked against block/formula grants within the PART because performance review is an oversight mechanism, whereas the premise of block grants is that funds are sent to the states with certain freedoms from complex federal oversight requirements. Many states and local governments have their own performance and accountability review processes; overlaying federal PART reviews has the effect of overriding state and local government self-management, contrary to the intent of block grant projects.

B. POLITICAL BIASES EMERGE THROUGH IMPLEMENTATION

1. Inconsistencies with Presidential Budget Request Cast Doubt on Purpose of Tool

A quick glance at PART ratings and budget requests should dissuade anyone from trying to find a logical or consistent pattern between them — there is no pattern. Even after reviewing almost every federal program and being used to develop multiple budget requests, it remains unclear if even the Bush administration uses the PART ratings to inform their budgeting decisions at the start of each year.

OMB Watch has conducted analyses of the list of programs highlighted by the President in each of the last two State of the Unions for not achieving the required results, as well as the broader list of programs reviewed under the PART and found some puzzling results. A few examples:

- Of the 85 programs receiving a top PART score in 2006, the president proposed cutting the budgets of more than 38 percent, including the National Center for Education Statistics and a land grant program run by the Tennessee Valley Authority.
- Of the programs rated “ineffective,” in the 2006 budget that were targeted for elimination, more than 78 percent came from the Departments of Housing and Urban Development or the Department of Education.
- The Substance Abuse Prevention Block Grant, a program that provides grants to state to address addiction problems, was given the lowest possible rating of “ineffective” but received no reduction in funding. Moreover, the Earned Income Tax Credit Compliance Program — which targets lower income working Americans who have claimed the EITC and double checks their eligibility for the credit — was rated ineffective, yet received a substantial funding increase.

The examples above are not used to cherry pick arbitrary cases, but underscore a larger pattern of inconsistency. Most troubling, in each of the last two years, of those programs singled out by the president for failing to produce results, **more than two-thirds had yet to be reviewed by the PART questionnaire**. In many more cases than not, it is unclear what kinds of determinations, if any, the president used to identify these supposed failing programs when the White House budget staff has not even used their own performance review tool to assess them.

While other analysts have criticized the failure of the PART to establish a toehold in the budget formulation process, we believe these facts point to a larger problem that underscores the need for Congress to be highly dubious of the usefulness of using PART scores to inform budget decisions. The lack of consistency among ratings and the president's own budget requests points to the possibility that the PART is merely a rhetorical tool to support pre-ordained political conclusions.

2. PART Sends Management Signals that Would Distorts Federal Priorities

OMB uses PART to alter the management of federal programs in troubling ways. The PART mechanism allows for OMB perspectives and policy preferences to be inserted into the oversight and management structures of federal programs without congressional approval. Agency staff implementing federal programs are subordinate to OMB within the construction of the survey answers in PART, and experience concrete consequences — such as flat or decreased budget requests and, if the administration is successful with pay-for-performance proposals, even the inability to receive an annual salary increase — if they fail to heed the management signals OMB sends through PART. As a result, PART has enormous potential to distort federal priorities in ways that Congress has never permitted.

OMB is, unfortunately, taking advantage of that potential. Many of the stated reasons for scoring programs negatively reflect nothing more than OMB's disagreement with the way Congress

designed a program by law. OMB does not merely suggest to Congress ways a program can be, in its view, improved; instead, OMB scores a program negatively and imposes consequences against it, such as reduced budget requests, simply for following the law. OMB then justifies its decision using the rhetoric of results rather than a direct statement of its disagreement with Congress. Some examples:

- The Consumer Product Safety Commission (CPSC), Occupational Safety and Health Administration (OSHA), and Mine Safety and Health Administration (MSHA) were all penalized for failing to use economic analysis in their rulemaking processes — even though they are forbidden by law and Supreme Court precedent from doing so. The CPSC is instructed by Congress not to use cost-benefit analysis when issuing rules specifically required by law, such as the rules governing garage door openers and bicycle helmets. CPSC (which, despite an otherwise high passing score, was categorized “Results Not Demonstrated”) was penalized for following the law and not conducting cost-benefit analyses for those rules. CPSC was also scored down for not complying with OMB’s demand for using net benefits as a criterion for regulatory decisions, even though CPSC’s authorizing legislation instructs the agency to take a different approach in order to maximize public safety. The same is true for OSHA and MSHA; OMB scored these programs negatively for failing to do “cost-benefit comparisons or monetiz[ing] human life,” even though their organic acts and Supreme Court precedent forbid these practices.
- OMB criticized the Appalachian Regional Commission (and flat-lined its budget request) in FY 2006 by claiming through the PART review that it was not a “unique” program, because other existing agencies provide the same services. OMB completely misses the point of the Appalachian Regional Commission, which Congress created precisely because the existing patchwork of programs was failing to meet the needs of the extraordinarily impoverished population of that region.
- Another program serving rural populations, HHS’s Rural Health Activities program, was likewise penalized for following the very law that created it. OMB’s criticism from the PART review speaks for itself: “The major flaw of the Office’s portfolio *stems from the programs’ authorization*” (emphasis added). The program was targeted for a drastic cut (83 percent) in the president’s budget this year.

Interestingly enough, these examples are no longer necessary; in a recent hearing before this very subcommittee, an OMB official was asked point-blank whether it is possible for programs to receive low PART score simply because it follows the law, and OMB answered, simply, “Yes.”²

This distortion of priorities is also happening in a host of more subtle and indirect ways. Buried in the small type of the specific program assessments, the standards actually used to measure program “effectiveness” or “results” very often fail to focus on what is most meaningful or relevant about a program. One particular example is that the Clean Water Revolving Fund was given a low passing score and slated for deep budget cuts, in part because PART measured success based on the “percentage of water miles/acres with fish consumption advisories removed.”

² Add citation to Carper/Johnson colloquy.

This measure is not a scientifically appropriate measure of actual water quality: as EPA recently announced, the number of rivers and lakes with mercury fish advisories increased in the last ten years even though the amount of mercury emissions actually declined by 100 tons.³ An increase in the number of advisories can actually be a sign of *success*, as it could mean the government is doing a better job of monitoring pollution and informing the public.

These conflicts between the statutory mandates imposed by Congress and the willful arbitrariness of OMB are waived away when the assessments are offered to Congress, and the scores are attributed to the program's "ineffectiveness" or failure to demonstrate results rather than OMB's decision to measure programs with inapposite criteria or include subjective judgments about a program's worth.

3. Grade Deflation Allows OMB to Manipulate Levers of Congressional Spending

While OMB has gone to great lengths to advertise the PART as having an unprecedented level of transparency for the public by unearthing vast amounts of government information for the public. While it is certainly true OMB has marketed the PART to the public as an open government initiative, the most crucial decisions, value judgments, and processes for arriving at the final product of a PART rating still remain largely hidden. These can often be the most important aspects of the entire process, masking a biased or manipulated product.

One of the most glaring examples of this is the "Results Not Demonstrated" (RND) rating. It is not clear how OMB determines which programs should be shifted into the category of RND. OMB assigns weights to the scores from each of the four PART sections and then assesses those scores on a grading scale to determine whether a program passes ("Effective," "Moderately Effective," or "Adequate") or fails ("Ineffective"). The category of "Results Not Demonstrated" is supposed to be reserved for programs that do not generate sufficient data or information upon which a passing or failing score can reasonably be assigned. Although explained in PART materials accordingly as an *indeterminate* category, programs relegated to the RND bin are often characterized in White House rhetoric as failing programs.

Indeed this fact has been confirmed during our interviews with agency employees as all those interviewed told us the RND rating was the absolute worse one a program could receive under the PART — far worse than an "Ineffective" rating.

The RND score is based on failure in a couple of specific questions. It is interesting to observe, however, that many of the programs scored RND otherwise score more highly in the section for producing *results*. In fact, 72 of the 178 programs (40 percent) categorized as "Results Not Demonstrated" by FY 2006 had scores that, according to OMB's own grading scale, would have been granted passing scores if not for failure on the specific RND-determining questions. Of these 72 programs, 12 should have received the high score of "Moderately Effective." These 12 programs have higher scores for section 4 — the section that notionally measures actual results — than the average score for all programs actually rated "moderately effective." Three programs — the Consumer Product Safety Commission, a USDA program for rural water treatment loans, and the National Credit Union Administration's Community Development Revolving Loan Fund —

³ Add citation to Aug 2004 announcement – this probably came from BNA

actually scored above 75 percent for producing results (substantially higher than the 60 percent average for all programs rated “Moderately Effective”).

Moreover, the remaining 60 of the 72 otherwise passing programs would have received the middle passing score of “Adequate” — again, if not for failing the specific RND-determining questions. More than half of them (31/60) scored higher for section 4 than the average section 4 score for all programs that actually received the score of “Adequate.” Almost as many (24/60) had overall scores that bested the average overall score for programs that OMB allowed to receive the “Adequate” score.

There is no explanation given for the weighting assigned to any of the particular questions or sections, nor for the absurd results once these weights are assigned. This inconsistency highlights an important point that emerged from our agency interviews as well. Implementation of the PART survey is highly dependent on the individual program officer at OMB, and working with different officers can not only completely alter the process by which the survey is completed but also the final rating for the program. The Government Accountability Office has also concluded that the PART gives a high level of influence to budget officers at OMB and leads to inconsistent application of the tool across the federal government.⁴

III. THERE IS A BETTER WAY

In much the same way other “budget process reform” proposals seek to increase the executive's control over federal revenues and spending priorities, PART also attempts to alter the balance of power within the federal government. The tool gives the executive a mechanism by which to impose its budgetary preferences, however political or biased, on Congress in a seemingly benign way by wrapping them in good government and results rhetoric.

While the President is certainly free to classify federal programs in whatever way he believe is best and recommend those programs be supported with increased funding or eliminated according to his own preferences, it is disingenuous to attempt to pass off subjective and, at times, politically motivated policy conclusions as unbiased program reviews.

There does seem to be some usefulness for the PART review process to serve as a diagnostic tool for program managers and agency employees. In particular, a process known as a PART cross-cut undertaken by OMB has shown significant promise as a model to improve efficiency of management and stewardship of specific programs across different agencies and departments. To our knowledge, this process was devoid of attempts to connect the results to significant alterations in budget priorities or alterations to the management agenda for implementing policy decisions. It true, I believe these are certainly aspects of the cross-cut that allowed it to be a productive exercise.

In order for the variety of actors whose input is needed to make formulate budgeting decisions to use any type of performance review mechanism, it is crucial for those actors to believe the information is credible and constitutes a consensus on objectives and goals.

⁴ See Government Accountability Office, *Performance Budgeting: Observations on the Use of OMB's Program Assessment Rating Tool for the Fiscal Year 2004 Budget*, No. GAO-04-174 (Jan. 2004)

This has not been the case with the PART. Many individuals both inside and outside of Congress remain highly skeptical of this tool and the process by which the ratings are determined by OMB. Perhaps the biggest reason for this belief is because the PART is attempting to reinvent the wheel from a new perspective. Congress already has the structural and institutional capacity to develop a rigorous system of determining results and effectiveness of government programs through the appropriating and authorizing processes. The vast resources of the Congress available within the committee and personal staff structure as well as in the offices such as the Congressional Budget Office, Government Accountability Office, and Congressional Research Service are more than sufficient to provide far more robust information about program performance and results.

Most importantly, relying too heavily on the PART ratings not only will gradually remove Congress from its funding and oversight responsibilities granted under the Constitution, but also will continue to close the door on opportunities for outside stakeholder interests to be infused into the congressional budgeting and evaluation process. This limited perspective on programs and goals is a crucial deficiency of the PART. By limiting the perspective of the reviews, the subjectivity and bias that will almost always creep into any time of rating does not have a counterbalance from a wide range of outside stakeholder interests.

While the expansion of the executive branch powers has been present in our government, particularly during times of war, since the turn of the last century, the overreach of those powers into areas historically and constitutionally given to Congress — the structuring of programs, appropriating and authorizing of revenues, and oversight of government — is a disturbing trend. Because of this, PART scores should be taken with more than just a grain of salt or even a hefty dose of skepticism by Congress. Unless the tool design and implementation system are significantly modified, they should probably be largely ignored.

Thank you for the opportunity to share our views with you here today. I look forward to your questions.