President
Robert R. Stickney
Texas Sea Grant College Program
Texas A&M University
2700 East Rudder Freeway S.,
Suite 1800
College Station, TX 77845
P: 979-845-3654
F: 979-845-7525
stickney@tamu.edu

President-Elect
Jonathan G. Kramer
University of Maryland

Past President
M. Richard DeVo
S.C. Sea Grant Consortium

External Relations Chair
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S.C. Sea Grant Consortium

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University of Southern California

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North Carolina State University

Carl Richards
University of Minnesota

External Affairs Director
Jennifer M. Greenemeyer
Sea Grant Association
1755 Massachusetts Ave., NW
Suite 800
Washington, DC 20036-2102
P: 202-448-1240
F: 202-448-1241
jgreenemeyer@sga.seagrant.org

www.sga.seagrant.org

15 November 2004

Dr. Jerry R. Schubel, Chair
National Sea Grant Review Panel
c/o Aquarium of the Pacific
320 Golden Shore, Suite 100
Long Beach, CA 90802

Dear Dr. Schubel:

The Sea Grant Association would like to thank the National Sea Grant Review Panel, and Nat Robinson in particular, for inviting our comments on the implementation of the current round of program assessments. As Nat observed at the 2004 Fall SGA meeting in Newport, Rhode Island, there remains some concern among our delegates about certain elements of the National Sea Grant Program Assessment process.

First, it is important for SGA to articulate that we are committed to the long-term success of the Program Assessment (PA) process. We welcome performance reviews as one of the critical elements of an ongoing process of improvement across the Network. They serve as a credible vehicle for Sea Grant to demonstrate accountability and sound management of federal funds. We believe that the PA process sets a benchmark for others in NOAA and throughout the federal government to emulate. In addition, we believe that no matter how many good outcomes programs can show — and there are many — they should always strive to find better ways of doing things. On some level, all programs can improve and all programs can and will become "excellent." The true mark of success of the PA process to date is that evaluation has been taken on as an integral part of Sea Grant program activities and processes.

We also recognize that there are significant challenges in implementing the Congressional mandate to rate Sea Grant programs and in comparatively assessing the performance of a highly diverse group of institutions. Continuous improvement of the PA process is in the best interest of the entire Network and is important in maintaining our excellent reputation — within the federal government and among our university partners — for relevant and effective self-evaluation.

Nat Robinson asked in October if we would assemble comments on the PA process from programs across the Network and convey them to the NSGRP. We accomplished that task via a survey shortly after that meeting. Respondents voiced many comments and concerns, not all of which are included in this letter. Our intent here is to briefly highlight the most important points, however, we would be happy to convey all the comments received if the NSGRP so wishes. There was consensus among those who responded that despite the best intentions and efforts of all parties involved, the current PA process is cut of scale for the amount of funds the national program has, for the people and funds Sea Grant programs have, and for the positive outcomes that result. The time and effort taken to prepare for a Program Assessment Team (PAT) visit is still perceived as excessive. There were a number of differing opinions on how best to address this issue. Respondents also emphasized the need for greater continuity and consistency in the composition of PA teams and for greater recognition of the diversity of local programs within the PA process.

With this as background, we would like to focus our comments on two issues that were the subject of many consistent responses — the NSGO Final Evaluation and the role of the NSGO Program Officer (PO). Of the many recommendations articulated in the report of the committee chaired by former NSGRP member Dr. John Toll (known as the Toll Report), several spoke directly to these issues. That they continue to challenge us in the current PA cycle suggests that a concerted effort be made to find efficient and equitable solutions — solutions that will be of substantive benefit to the PA process and the Network as a whole.

NSGO Final Evaluation
Because every PAT is different SGA recognizes the need for a NSGO Final Evaluation process to level out or normalize PA scores in relation to one another. We also recognize that some measure of quality is needed to rate one program against another as required by Sea Grant's authorizing legislation. However, it
appears that several problems first identified in the Toll Committee Report persist. Specifically, questions remain about the Final Evaluation process being truly meritocratic, clearly delineated, and transparent.

Specific SGA suggestions regarding the Final Evaluation include:

* There are significant questions about the NSGO weighting for the 14 "criteria and benchmarks" for the Final Evaluation. A full disclosure of these and how they differ from those used by PATs is needed.
* Reduce the Final Evaluation to a "leveling" of PA scores among the reviews in one calendar year and, in doing so, remove the "second program review" conducted by the NSGO.
* Use the Final Evaluation to correct obvious erroneous subcategory scores on the PAT score sheets. Corrections would be based on the letter of response from Program Directors to the PAT reports and input from the seven or eight PAT Chairs for that year.
* Include SG Directors and PAT Chairs as observers in some logical way. PAT chairs should observe on behalf of the programs they evaluated, and the Director who participated as a PAT member in a given Program Assessment could observe the Final Evaluation meeting on behalf of that program.
* The Toll Report notes that "numerical metrics must be viewed as only one of several assessment tools available within the large context of the Program Assessment process as a whole." Greater reliance on the meaningful narratives from the PATs is needed as they capture much more than simple metrics can.
* Delete the confusing Final Evaluation Report (see below) and replace it with a brief letter that includes the overall program score and the revised score sheet.

Final Evaluation Report
SGA is concerned about the content and manner of distribution of recent Final Evaluation reports. Sometimes certain language can have unintended consequences for individuals and programs, a result that marginalizes the SG evaluation process. As mentioned above, the SGA prefers to delete the Final Evaluation Report. However, if the NSGO feels it must have such a report, we recommend it be clear, concise and have the following attributes:

* Feedback should always be constructive with a clear stated intended purpose.
* No item should appear in a letter of Final Evaluation from NSGO that has not been previously raised with the PAT, program director and university administration.
* Final Evaluation reports need to be better vetted before being sent out to University officials. Specifically, a draft Final Evaluation should be shared with the PAT Chair and the Program Director before being distributed to university officials.

The Important Role of the Program Officer
Legitimate and pervasive concerns about the final evaluation also focused on 1) the fact that NSGO Program Officers (POs) who are unfamiliar with many of the programs "vote" on the final status of a program and 2) those programs that had frequent changes in NSGO POs can be at a disadvantage in the NSGO deliberations. As noted in the Toll Report, an on-going dialogue between Sea Grant Program Directors and NSGO POs is a key component of program evaluation and is essential to achieve a continuous exchange of information between the NSGO and local programs.

Specific suggestions regarding NSGO POs include:

* POs should be given resources to spend more time getting to know the programs for which they are responsible. SG Directors have great respect for their POs, but regret that they are often unable to establish more substantive interactions over the course of a given review cycle. These issues were noted in the 2002 Report of the NSGRP Committee chaired by Dr. Duce as well ("Building Sea Grant: The Role of the National Sea Grant Office pg. 38-39).  
* Switching of NSGO POs should be kept to a strict minimum. If this is not possible, significant consideration of this should be given during the Final Evaluation.

Reaching the Goal of Program Improvement
SGA believes strongly in the intent of the Review Process — to improve the Network and ultimately have all programs excel. Taken in total the comments from the local programs reflect the desire to use the PA process in a constructive manner to build local and Network strength. While acknowledging that "competition" was one objective of the language added to Sea Grant's authorization in 2002, the tight
coupling of the PA process to program funding diminishes the primary focus of the process on improvement. Toward this end, we encourage the NSGRP to consider the following suggestions:

- Lessen the burden of the PAT visit.
- Decouple the PAT visit and financial reward to lessen the “event” nature of the review.
- Use some of the available funds to support programs to help them improve in deficient areas and in doing so, steer the PA concept back toward an emphasis on program improvement.

Understanding that program evaluation must include an on-going continuous dialog, SGA believes that there needs to be a thorough, open vetting of the process, which could entail another one-year analysis and reassessment after the current round is completed. We emphasize that our goal is not to eliminate the process, nor is it likely that we can ever perfect it. We do believe it is possible to configure a process more appropriate in scale and intent that will meet the needs of credibility and accountability and contribute to program improvement nationwide.

SGA welcomes the opportunity to provide these comments and looks forward to working with the NSGRP to strengthen our PA process so it may remain a model for evaluation of Federal-state-University partnerships.

Sincerely,

[Signature]

Robert R. Stickney
President

cc: Ron Baird, Director, National Sea Grant Office