

## **FREQUENTLY ASKED OR ANTICIPATED QUESTIONS ABOUT DEVELOPING SECTION 312 EVALUATION METRICS FOR COASTAL MANAGEMENT PROGRAMS**

**Question 1:** How will CPD's FY11 funding guidance specify that a program must develop these metrics? Is it necessary for a program to include a separate task in the agreement application to address metrics development, should it be included in a general administration task, or is there another mechanism to use?

**Answer:** In their FY 2011 cooperative agreement applications, state and territory CMPs should include language in a new or existing task that indicates that the state will identify goals, objectives, performance measures, and numerical targets to be used for Section 312 evaluations. CMPs should submit initial draft metrics to their OCRM/CPD specialist in sufficient time to allow for review and comment. Final draft metrics should be submitted no more than 11 months after the start of their FY 2011 award (i.e., for July 1 states: May 31, 2012; for Oct 1 states: August 31, 2012) to allow for OCRM review and approval. Data collection in support of 312 performance metrics is not required to begin until the start of the FY 2012 grant cycle.

**Question 2:** Is there any standard or "model language" to use in the CZM cooperative agreement application in a task to show the program's intent to work on this?

**Answer:** The language should, at a minimum, indicate that the state will identify goals, objectives, performance measures, and numerical targets to be used for Section 312 evaluations.

**Question 3:** How many goals, objectives, performance measures, and targets need to be identified and by what date?

**Answer:** Each coastal management program must identify three (3) objectives from which to derive performance measures. It is acceptable to use one goal with three objectives, two separate goals with a combination of three objectives, or three separate goals with one objective for each, so long as three measures, each with an associated target, are established for a five-year period.

Final draft metrics should be submitted no more than 11 months after the start of their FY 2011 award (i.e., for July 1 states: May 31, 2012; for Oct 1 states: August 31, 2012) to allow for OCRM review and approval. An evaluator from the OCRM National Policy and Evaluation Division (NPED) will collaborate with each CPD specialist and coastal management program and provide input as needed throughout the process to reach approval.

**Question 4:** How can a coastal program establish a target if there is no baseline data available for the objective?

Answer: Each program should be careful to identify performance measures with targets that can be counted. Although the “Examples of Evaluation Metrics” includes some objectives that use changes by a percentage, that will only be useful and realistic if a baseline number already exists. For example, if a program wishes to identify an objective related to coastal accessibility, the objective might identify a 10% increase in the number of access points ONLY if the program already knows the current number of access points. Otherwise the objective should identify a specific number of new access points that can be counted during the five-year period without knowing the initial number of existing access points.

**Question 5:** Do the metrics themselves have to relate to a program’s most recent Section 312 evaluation?

Answer: No.

**Question 6:** If the coastal management program does not have a strategic plan and does not want to use the CZMAPMS, can the program develop its own goals, objectives, performance measures, and targets?

Answer: Yes. The goals and objectives should reflect important priorities to a coastal management program or help to highlight its unique identity, because the corresponding measures will be used during a Section 312 evaluation to illustrate an individual coastal management program’s progress.

**Question 7:** May the coastal management program tie metrics development to its Section 309 assessment and strategies?

Answer: Yes, although a program does not have to.

**Question 8:** Does data collection have to begin as soon as the metrics are approved?

Answer: No. The FY12 funding guidance will include a requirement to collect data and report on progress for the specific performance measures that a program has developed. Data collection will begin once the FY 12 cooperative agreement award is awarded. There is no requirement to start data collection earlier. The FY 12 funding guidance will also include a requirement and procedures for reporting on progress toward meeting the identified targets in semi-annual performance reports.

**Question 9:** If data is collected and progress reported for five years in order to be one element of information used during a Section 312 evaluation, what happens if the evaluation occurs before the end of five years?

**Answer:** The evaluation will consider the data and progress toward meeting the identified targets regardless of when an evaluation occurs during that five-year period. For example, if only two years' worth of data collection and progress toward meeting the targets has occurred before the evaluation, then only those two years will inform the evaluation findings. The remaining three years would be considered in the program's next evaluation.

**Question 10:** How will these metrics be used?

**Answer:** Targets, and progress toward them, will be one element for review during the Section 312 evaluation. The qualitative and quantitative information OCRM has traditionally gained during pre-site visit review of materials and through meetings, discussions, and phone calls during and after the site visit is extremely valuable and will continue to be used to inform the findings. Establishing performance measures and targets is an effort to include an additional quantitative data point in evaluations, an additional reference to inform program review and discussion, and to provide greater accountability.

If a coastal management program does not meet a particular target, that does not mean the CMP will be found 'not in compliance' or require that sanctions be imposed. If a target is not met, reasons and context will be discussed during an evaluation, considering whether unforeseen or unavoidable circumstances occurred, whether the target was unrealistic, or whether it should be revised or replaced with one that is better aligned with the CMP goal and objective. The evaluation findings will reflect that, and a recommendation could be included as a result of the situation.

One coastal management program's progress will not be compared with any other CMP. A coastal management program's targets and its progress toward meeting those targets are unique to the CMP, making it irrelevant for comparative purposes.

**Question 11:** Will OCRM please provide some examples of these evaluation metrics?

**Answer:** Yes. OCRM has developed examples for both more regulatory programs and more networked programs. **Please remember that these are examples only.** The examples have been revised to be clearer about the target time period, which is five (5) years. A program may identify some target number to be achieved annually, but that would mean the target total at the end of five years is five times the annual target. That will require a fairly high degree of confidence that the same number can be achieved five years in a row. A single target for the five year period is probably more realistic in that it can take into account some fluctuation each year. It also is more realistic for a performance measure that may take more than a single year to achieve; i.e., fee simple or conservation easement acquisition for public access points that could take two or three years from start to completion.