

Memorandum

TO: The Commission on Evidence-based Policy

FROM: Members of the Interagency Council on Evaluation Policy

SUBJECT: “Top-5 List” of issues and solutions related to Federal evaluation activity

DATE: November 22, 2016

Several individual members of the Interagency Council on Evaluation Policy appreciate the opportunity to provide input to the Commissioners as you proceed to consider strategies to improve data for use in evidence-building. The following are the top issues of concern to Federal evaluation offices, along with several solutions for the Commission to consider.

1. **ISSUE:** *Key federal administrative and statistical data sources* are inaccessible for evaluation purposes or incomplete as a result of statute, policy, or administrative practices.

SOLUTION: Establish a mechanism to assist agencies to act upon their M-14-06 statistical and administrative data priorities:

- a. Establish cooperative information technology procedures (e.g., data security, privacy, and data maintenance) for Federal agencies that share or exchange data to do so more efficiently (currently agencies have different informational technology and privacy rules and procedures which typically requires a new or modified memorandum of agreement)
 - b. Establish expedited procedures for Federal agencies to more easily and directly access data from Federal statistical agencies for evaluations (e.g., develop special approval and access procedures for Federal agencies rather than requiring them to follow the cumbersome general public procedures for accessing data through Census Research Data Centers; allow federal agencies to access the data directly from secure Federal offices and computers).
 - c. Require records in some key Federal data bases used for evaluations, such as the National Directory of New Hires (NDNH) to be maintained permanently to allow data to be linked and tracked for evaluations requiring long-term data (e.g., pre-program and post-program follow up).
2. **ISSUE:** *Federal evaluation capacity and activity* is uneven across agencies

SOLUTION: Establish an independent federal evaluation system to 1) articulate the specific role and value of evaluation in evidence-building, 2) facilitate the development of strong, independent evaluation offices in all agencies, and 3) reinforce the importance of evaluation offices to strengthen the support for the offices within their agencies.

- a. Encourage Departments and Agencies to establish independent evaluation offices to coordinate evaluation efforts and build evaluation capacity, but also acknowledge there is often a complementary and important role for special independent research institutes, bureaus or offices where they exist (e.g., DOJ-NIJ, USDA-ERS, DOL-BLS, Commerce-Census).
- b. Develop general principles and practices for Federal evaluation offices (see NAS workshop)
- c. Clarify that evaluation and evidence-building is a unique activity, not to be conflated with data collection or performance measurement and monitoring:
 - i. Evidence is not reducible to data (see Goldstein/ACF testimony)
 - ii. Evaluation capacity is not reducible to data collection capacity (see Goldstein/ACF testimony)
 - iii. Rigorous evaluation is not reducible to impact studies using RCTs (see Goldstein/ACF testimony)
- d. Establish an interagency evaluation coordination structure (see Goldstein/ACF testimony)
- e. Make the Federal evaluation system a complement and counterpart to the Federal statistical system rather than subsumed by the latter (see Goldstein/ACF testimony)
- f. Strengthen and clarify privacy/confidentiality protections that also allow access for Federal evaluations by clarifying statutory provisions in the Privacy Act, Freedom of Information Act, and the Family Educational Rights and Privacy Act (see O'Regan/HUD testimony)

3. ISSUE: Often there is no or *inadequate funding* available to conduct rigorous evaluations

SOLUTION: Ensure adequate evaluation funding

- a. Expand flexible evaluation funding set-aside authority to more agencies to allow funding for program evaluations
- b. Embed evaluation funding and requirements into programs when possible
- c. Increase cross-agency transfer authority to allow combining funding for evaluations that span multiple programs/agencies when appropriate (see Solution 1.b. above).

4. ISSUE: A number of *bureaucratic barriers* discourage evaluation, create inefficiencies and pose additional costs when conducting a Federal evaluation, particularly issues related to PRA, IAAs, and procurement.

SOLUTION: Reduce bureaucratic complexity and barriers to evaluation

- a. Streamline PRA requirements for Federal evaluations to minimize cost and time:
 - i. Assign PRA responsibility to agencies on collections below some threshold such as 1,000 responses or under 500 burden hours (see O'Regan/HUD testimony)

- ii. Allow PRA responsibility to be assigned to agency evaluation offices that have established formal clearance, peer/technical review, statistical expertise, and public notice procedures
 - iii. Reduce requirements for public comment periods in some cases, e.g. no second public comment period if there are no substantive comments during the first period.
 - b. Streamline the Federal Interagency Agreement (IAA) processes to allow more efficient collaboration and sharing of funds for cross-agency evaluations and data exchanges:
 - i. Use pre-approved agreement templates for expedited clearance in Federal agencies
 - ii. Standardize the legal procedures and requirements across Departments to facilitate and speed up interagency agreements.
 - c. Allow more flexible procurement strategies for evaluations to improve study quality and efficiency (see 2017 President’s Budget)
 - i. Allow Federal agencies a five year period of funds availability to allow agencies to pool funds over multiple years to pay for large, long-term evaluations.
 - ii. Provide Federal evaluation agencies with the authority to recapture, and re-obligate for other studies, unused funds not needed to complete a particular study (e.g., unused termination costs, or cost savings from projects that proceed more quickly than expected).
5. Each agency has unique data requirements for program evaluations. Below are examples of specific solutions that relate to evaluations using employment, wages, tax, research projects, health, and education data):
- a. Allow access to the National Directory of New Hires (NDNH) employment and earnings data for Federal evaluations (see FY 2017 President’s Budget pp. 303-307, 328-330: https://www.acf.hhs.gov/sites/default/files/olab/final_cj_2017_print.pdf), and maintain the records for longer periods of time to allow for long-term follow-up.
 - b. Allow administrative data with unique identification and collected in workforce development, education, research grants, public housing, social services and public assistance programs to be linked at the individual level and shared among Federal agencies for evaluations (with appropriate security and privacy protections). (For WIOA example see President’s Budget Fiscal Year 2016: Analytical Perspectives, pp. 69-70: <https://www.whitehouse.gov/sites/default/files/omb/budget/fy2016/assets/spec.pdf>).
 - c. Improve Federal agency access to the Longitudinal Employer and Household Dynamics (LEHD) files for evaluations.
 - d. Improve access to individual level student-level data (e.g., K-12 and post-secondary) for Federal evaluations (with appropriate security and privacy protections) (see testimony of multiple witnesses at October public hearing).

- e. Improve the ability of the vital statistics systems to be more interoperable with other electronic healthy data systems and foster the use of national standards on birth and death statistics to support interoperability for evaluation and research.

We would be happy to discuss any of these issues or solutions. Please feel free to contact any of the following:

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