

DATE: August 24, 2016

TO: Katherine G. Abraham, Chair, Commission on Evidence-Based Policymaking
Ron Haskins, Co-Chair

SUBJECT: Testimony submission to the Commission on Evidence-Based Policymaking

THROUGH: Shelly Martinez, Executive Director for the Commission on Evidence-Based Policymaking

VIA EMAIL: rochelle.wilkie.martinez@census.gov

On behalf of the American Evaluation Association (AEA), we are writing in support of the Evidence-Based Policymaking Commission and to thank you for your efforts on such an important and challenging undertaking. AEA formally supported this legislation and worked with Congressional staff during its drafting to advance awareness and use of evaluation in government decision making. Both Congress and executive branch agencies have critical needs for credible assessments of the relevance, efficiency, and effectiveness of government programs, policies, and activities. AEA applauds the work of the Commission to help Congress embed evaluation into program design and to ensure that quality data are available for evaluation of federal programs.

AEA looks forward to addressing the specific questions and issues that arise during the Commission's deliberations. We are prepared to provide support and advice in any manner that best suits the needs of the Commission. This could include (1) in-person testimony during which AEA can engage in a dialogue with Commission Members, (2) suggestions about possible members for any evaluation-focused advisory committees, (3) interaction with various Commission subcommittees, and (4) additional, more detailed, documents.

At the outset of your work, and drawing on its collective extensive evaluation expertise and over 30 years of practical experience, AEA wishes to bring the following recommendations to your attention regarding a portion of the charges to the Commission:

Under section 4 (a), the Commission is charged with making “recommendations on how best to incorporate outcomes measurement, institutionalize randomized controlled trials, and rigorous impact analysis into program design.”

We agree that program design should include an appropriate evaluation framework to guide data collection and use over the life of a program. Such early evaluation planning also enables the use of rigorous impact evaluation methods that require data collection prior to implementation, such as randomized control trials. However, the opportunity to capitalize on early successes or to make mid-course corrections is also critical, so it is essential also to conduct ongoing formative evaluation through the program's life cycle. For example, evaluation can address questions that arise during implementation of the program, such as the validity of assumptions that underlie program design, or challenges to implementation in the field. Early in the program's history, relatively simple information may be needed quickly (e.g., regarding obstacles to participation in the program). Evaluators should match the

methodology to the stage of program development and to information needs, which may call for a range of methods over time, including targeted data collection that may not always include outcomes measurement. Thus, the optimal integration of outcomes measurement, randomized controlled trials, and rigorous impact analysis should include room for other methods as well.

Such a framework will also include several other components, including: (a) a sound procedure for establishing annual and multi-year evaluation agendas and timetables, (b) consultation with appropriate congressional committees, OMB, and other external program stakeholders on their information needs, (c) a dissemination plan, preferably with public access, (d) resources needed for evaluation, and (e) formal expectations regarding how the findings and conclusions of evaluations shall be considered in subsequent program design, program management, and decisions regarding program reform, expansion or termination.

Organizational structure and staffing are also important. Thus, we suggest it important to ensure independence of the evaluation function from program offices with regard to evaluation design, conduct, and reporting. Consultation is needed to ensure relevance, but independence is needed to ensure impartiality. Adequate staffing of evaluation units and support for professional development are also necessary if the Commission's work is to achieve the kind of benefits foreseen by Congress.

Under section 4 (b), the Commission is charged to 'consider whether a clearinghouse for program and survey data should be established and how to create such a clearinghouse.'

We encourage the Commission to engage in this important task while trying to avoid unintended negative side effects. While recognizing the value and importance of large-scale extant archives and datasets, they should not reduce the capacity to gather targeted data as needed to address program evaluation questions. Measures of a program's key processes and outcomes should be established while the program is being developed, and should be put into place by the time program implementation begins. The most relevant measures might not exist in an extant clearinghouse.

We also ask the Commission to consider whether the proposed clearinghouse could serve as a repository for evaluation reports, serving as an archive capacity for the collection, dissemination, and preservation of knowledge and lessons learned from evaluation studies. This would provide an enhanced base for guiding future program design and management, which often requires a critical mass of knowledge to properly comprehend and address the complexity of program processes and influences. It would also be a great benefit for future meta-analyses of evaluation findings.

The American Evaluation Association has been the professional organization devoted to the application and exploration of evaluation in all its forms since 1986. It now has 6,000 members across all 50 states, as well as 80 other countries. It has developed professional standards for the quality of studies and ethics for the multidisciplinary members of the field. AEA has created a community of learning and practice over the decades, in which its members in academia have worked to develop, refine and teach evaluation methods, while its members in practice have served the evaluation needs of agencies across the federal (as well as state and local) government. AEA developed the attached *An Evaluation Roadmap for a More Effective Government* (www.eval.org/d/do/472) to offer to improve evaluation and the use of study results in the federal government. This document defines "evaluation" and addresses management

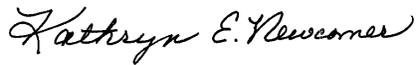
requirements for ensuring evaluation quality and usefulness, including methods, human resources, budgets, independence, transparency, and professional ethics.

We look forward to a dialogue regarding Commission efforts and progress. If we can be of further assistance, or if you need more information about evaluation or our organization, please do not hesitate to call on us or to contact Dr. Cheryl Oros, our Senior Advisor for evaluation policy (EvaluationPolicy@eval.org; 202-367-1166).

Sincerely,



John Gargani, Ph.D.
President, American Evaluation Association



Kathryn Newcomer, Ph.D.
President-Elect, American Evaluation Association



Stewart Donaldson, Ph.D.
Past President, American Evaluation Association

Attachment: *An Evaluation Roadmap for a More Effective Government* (www.eval.org/d/do/472)