

July 25, 2017

Dr. Katharine G. Abraham, Chair
Mr. Ron Haskins, Co-Chair
Evidence-Based Policymaking Commission
U.S. Census Bureau
4600 Silver Hill Road
Suitland, MD 20746

Dear Chairwoman Abraham and Co-Chairman Haskins,

We are writing to encourage you to consider including the attached policy recommendations in your final report to Congress and the Administration.

We believe that the Commission can help Congress and the Administration invest taxpayer dollars in what works by developing administrative and legislative policy recommendations that promote:

- Building evidence about the practices, policies and programs that will achieve the most effective and efficient results so that policymakers can make better decisions;
- Investing limited taxpayer dollars in practices, policies and programs that use data, evidence and evaluation to demonstrate they work; and
- Directing funds away from practices, policies, and programs that consistently fail to achieve measurable outcomes.

Although the Evidence-Based Policymaking Commission Act of 2016 directs the Commission to study and report on several important topics including data privacy and data sharing, our attached policy proposals focus on the provision that directs the Commission to “make recommendations on how best to incorporate outcomes measurement, institutionalize randomized controlled trials, and rigorous impact analysis into program design.”

We thank you in advance for your consideration of our recommendations.

Sincerely,

Actionable Intelligence for Social Policy (AISP)
AdvancED
America Forward
AppleTree Institute for Education Innovation
Building Educated Leaders for Life (BELL)
Cascade Philanthropy Advisors
Center for Employment Opportunities
Center for Research and Reform in Education,
Johns Hopkins University
Children's Literacy Initiative
Chrysalis
Communities In Schools

Community Training and Assistance Center
(CTAC)
Democracy Builders
EDGE Partners
Education and Outreach Group, Sonoma State
University
Efficacy
Empirical Education, Inc.
Everyone Graduates Center
GreenLight Fund
Healthy Teens Coalition of Manatee County
(FL)
Institute for Child Success

Juma
JVS Boston
KIPP
Knowledge Alliance
Leading Educators
Millionair Club Charity
Morino Institute
National Forum to Accelerate Middle-Grades
Reform
National Prevention Science Coalition
New Classrooms
New Moms, Inc.
Nonprofit Finance Fund
North Texas Alliance to Reduce Unintended
Pregnancy in Teens
Per Scholas
REDF
Research Institute for Key Indicators
Results for America
Roca
Root Cause
Sorenson Center for Impact
Success for All Foundation
Sunlight Foundation

Teach For America
The Dibble Institute
The Policy & Research Group
TNTP
Turnaround for Children
UTEC, Inc.
Venture Philanthropy Partners (VPP)
YES Prep Public Schools
Youth Villages

Andrew Feldman, former Associate Director of
the Evidence Team, White House Office of
Management and Budget
Christine Mahoney, Director, Social
Entrepreneurship, University of Virginia
Rebecca A. Maynard, University Trustee Chair
Professor of Education & Social Policy,
University of Pennsylvania
Joshua Ogburn, Director, University of Virginia
Pay for Success Lab
Paul Schmitz, CEO, Leading Inside Out, and
Senior Advisor, Collective Impact Forum
Matt Segneri, Director, Harvard Business
School Social Enterprise Initiative

cc: Members of the Evidence-Based Policymaking Commission

INVEST IN WHAT WORKS COALITION RECOMMENDATIONS

Data Collection

- **Federal Data Infrastructure**: The Commission should consider recommending that Congress and the Administration provide sufficient funding to help the U.S. Census Bureau accelerate the process of acquiring key administrative data-sets from local, state, and federal agencies, and strengthen its infrastructure for processing, standardizing, linking, and making data available to other government agencies and independent researchers via data use agreements with strong privacy protections. As part of this effort, the Census Bureau should develop an inventory of data-sets at the local, state, and federal levels and make this inventory accessible to government agencies and independent researchers.
- **Federal Data Inventories**: The Commission should consider recommending that Congress and the Administration codify into law what is already required by the May 2013 [Executive Order](#) by [passing the OPEN Government Data Act](#). This legislation would mandate that every federal agency create an enterprise data inventory of all data sets held by the agency and make these lists public in machine-readable formats with strong privacy protections.
- **Federal Data Information Technology**: The Commission should consider recommending that Congress and the Administration provide sufficient funding to allow every federal agency to update and modernize its IT infrastructure that supports data collection, analysis, sharing, and usage so that data can be appropriately structured, protected, analyzed and disclosed in line with the [updated information policy of the United States](#). A 2016 [report](#) by the U.S. General Accountability Office highlighted the urgent need for the U.S. government to modernize its aging legacy systems.
- **Workforce Data**: The Commission should recommend that Congress and the Administration allow the linking of workforce datasets (including but not limited to state and federal unemployment insurance and new hires data sets) to improve the effectiveness and efficiency of publicly-supported workforce development programs, as long as the linking is consistent with strong privacy protections. For example, many states cannot determine the impact of their job training programs without the ability to link their participant information with information about wage earnings across multiple states where participants obtain employment.
- **State Education and Workforce Data Systems**: The Commission should recommend that Congress and the Administration support the enhancement of the existing State Longitudinal Data Systems (SLDS) program administered by the U.S. Department of Education, which helps states integrate education and workforce data, and the proposed expansion of the Workforce Data Quality Initiative that would help build state and local capacity to track employment and educational outcomes of Workforce Innovation and Opportunity Act program participants, including those with disabilities, and provide information about job success rates and training programs.
- **Federal Education Data Identifiers**: The Commission should consider recommending that Congress and the Administration direct federal agencies to standardize the way they collect and share student-level identifiers (e.g., de-identified but encrypted) so that researchers can more effectively evaluate publicly-supported education and workforce development programs.

This information should be housed in one federal agency in order to promote appropriate sharing and usage of this standardized data.

- **Federal Programmatic Data**: The Commission should consider recommending that Congress and the Administration authorize every federal agency to set aside 1% of their program funds for program evaluations that generate programmatic outcomes data that can help make federal programs more effective and efficient.

Data Analysis

- **Data Leadership and Infrastructure**: The Commission should consider recommending that Congress and the Administration direct every federal agency to have a senior staff member (i.e., Chief Evaluation Officer or equivalent position) with the authority, staff, and budget to develop important programmatic data through the evaluation of its major programs and to use this programmatic data and available administrative data to inform the agency's policies and improve its programs.
- **Paperwork Reduction Act (PRA)**: The Commission should consider recommending that OMB exempt any rigorous program evaluation from PRA requirements if the evaluation: 1) has a sample size of 1000 or less (the current exemption is 9 or less); or 2) is conducted or overseen by an agency that has strong standards and quality controls to ensure that evaluations are independent, rigorous, go through peer review, use existing high-quality data wherever possible, protect privacy, and are transparent by releasing reports publicly regardless of the findings. PRA requirements were originally designed to curtail burdensome surveys, not limit the timing and ability to conduct program evaluations, which it does now. These simple reforms have been [recommended](#) by [former government officials](#) who encountered PRA hurdles when trying to evaluate the effectiveness of government programs.

Data Sharing

- **Local and State Data Systems**: The Commission should consider recommending that Congress and the Administration clarify that local and state agencies can invest federal program funds in strengthening their data infrastructures for processing, standardizing, linking, and making data available to other government agencies and independent researchers via data use agreements with strong privacy protections.
- **Federal Education Data Infrastructure**: The Commission should consider recommending that Congress and the Administration strengthen the U.S. Department of Education's (ED's) data infrastructure, including the hiring and training of key analytic staff, to manage the collection, quality, release, and analysis of education data with strong privacy protections and the support the InformED initiative that pulls together ED's diverse array of data and studies on a particular topic, and allow open data access to help unlock answers to pressing education questions and needs.

Data Usage

- **“What Works” Clearinghouses:** The Commission should consider recommending that Congress and the Administration direct every federal agency to develop a “What Works” clearinghouse or evidence exchange with the purpose of making evaluation reports available to the public.
- **Performance Management/Continuous Improvement:** The Commission should consider recommending that Congress and the Administration direct every federal agency to develop and operate a performance management system with clear and prioritized outcome-focused goals and aligned program objectives and that frequently collects, analyzes, and uses administrative and programmatic outcomes data to improve outcomes, return on investment, and other dimensions of performance.
- **Federal Grant Programs:** The Commission should consider recommending that Congress and the Administration direct every federal agency to use evidence of effectiveness, including impact analysis and other outcomes measurements based on high-quality administrative and programmatic outcomes data, when allocating funds from its 5 largest competitive and non-competitive grant programs. Current examples of this approach include creating a priority or competitive preference points for grant applicants that demonstrate evidence of effectiveness, requiring a percentage or all of grant funds be invested in evidence-based interventions, using a tiered-evidence framework to structure competitive grant programs, and authorizing Pay for Success as an allowable or required activity.
- **Evaluation and Research:** The Commission should consider recommending that Congress and the Administration direct every federal agency to have an evaluation policy, evaluation plan, and research/learning agenda which ensures that the agency has an intentional approach to the collection, analysis, sharing, and usage of administrative and programmatic data and publicly release the findings of all completed evaluations to improve the effectiveness and efficiency of federal programs.
- **Evaluation and Flexibility:** The Commission should consider recommending that Congress and the Administration include waiver (or other flexibility) authority in federal programs that allows for the testing of new ideas but require rigorous evaluation of those ideas, in order to build evidence of what works and to ensure evidence is used to improve results. This could reduce unnecessary burdens on state and local innovation and encourage federal agencies to shift from monitoring compliance to tracking outcomes.
- **Repurpose for Results:** The Commission should consider recommending that Congress and the Administration direct every federal agency to use its administrative and programmatic data to determine when to shift funds away from practices, policies, and programs which consistently fail to achieve desired outcomes and toward evidence-based, results-driven solutions.