

September 9, 2016

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 invest taxpayer dollars in what works by assisting policymakers at all levels of government in:

- 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)
America Forward
Center for Employment Opportunities
Center for Research and Reform in Education, Johns Hopkins University
KIPP
REDF
Results for America
Sorenson Center for Impact
Success for All Foundation
Sunlight Foundation

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.

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 proposed InformED initiative that would pull 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.
- **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.
- **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.

CRITERIA	 Administration for Children and Families (HHS)	 National and Community Service Corporation for	 Millennium Challenge Corporation	 U.S. Agency for International Development	 U.S. Department of Education	 U.S. Dept. of Housing & Urban Development	 U.S. Department of Labor
TOTAL SCORE (Out of a possible 100)*	80	72	85	83	80	76	80
1. Leadership: Did the agency have a senior staff member(s) with the authority, staff, and budget to evaluate its major programs and inform policy decisions affecting them in FY16?	8	8	8	8	8	8	9
2. Evaluation and Research: Did the agency have an evaluation policy, evaluation plan, and research/learning agenda(s) and did it publicly release the findings of all completed evaluations in FY16?	9	8	9	8	8	8	9
3. Resources: Did the agency invest at least 1% of program funds in evaluations in FY16? <i>(Note: Meeting this criteria requires both Agency and Congressional action.)</i>	7	7	10	10	7	6	8
4. Performance Management/Continuous Improvement: Did the agency implement a performance management system with clear and prioritized outcome-focused goals and aligned program objectives and measures, and did it frequently collect, analyze, and use data and evidence to improve outcomes, return on investment, and other dimensions of performance in FY16?	8	7	8	8	8	9	9
5. Data: Did the agency collect, analyze, share, and use high-quality administrative and survey data - consistent with strong privacy protections - to improve (or help other entities improve) federal, state, and local programs in FY16?	9	8	9	9	9	9	9
6. Common Evidence Standards/What Works Designations: Did the agency use a common evidence framework, guidelines, or standards to inform its research and funding decisions and did it disseminate and promote the use of evidence-based interventions through a user-friendly tool in FY16?	9	8	8	8	9	7	9
7. Innovation: Did the agency have staff, policies, and processes in place that encouraged innovation to improve the impact of its programs in FY16?	8	7	9	9	8	8	7
8. Use of Evidence in 5 Largest Competitive Grant Programs: Did the agency use evidence of effectiveness when allocating funds from its 5 largest competitive grant programs in FY16?	7	9	8 ¹	8 ²	8	7	7
9. Use of Evidence in 5 Largest Non-Competitive Grant Programs: Did the agency use evidence of effectiveness when allocating funds from its 5 largest non-competitive grant programs in FY16? <i>(Note: Meeting this criteria requires both Agency and Congressional action.)</i>	7	7	N/A	N/A	8	7	7
10. Repurpose for Results: In FY16, did the agency shift funds away from any practice, policy, or program which consistently failed to achieve desired outcomes? <i>(Note: Meeting this criteria requires both Agency and Congressional action.)</i>	8	3	8	7	7	7	6

* These scores are based on information provided by the 7 federal departments and agencies included in this index. You can find this background information - as well as a description of how RFA developed these scores - at <http://results4america.org/policy/invest-in-what-works-indices/>

¹ Since MCC only administers competitive grant programs, its total possible score was 20 for Question #8 and 0 for question #9.

² Since USAID only administers competitive grant programs, its total possible score was 20 for Question #8 and 0 for question #9.

EVIDENCE / EVALUATION CRITERIA

1. **Leadership:** Did the agency have a senior staff member(s) with the authority, staff, and budget to evaluate its major programs and inform policy decisions affecting them in FY16?

ACE:

- In late FY15, ACF established the new career position of Deputy Assistant Secretary for Planning, Research, and Evaluation to oversee its [Office of Planning, Research, and Evaluation](#) (OPRE) and support evaluation and other learning activities across the agency. ACF's budget for research and evaluation in FY16 is approximately \$142 million. ACF's [evaluation policy](#) gives the OPRE Director (now Deputy Assistant Secretary) "authority to approve the design of evaluation projects and analysis plans; and...authority to approve, release and disseminate evaluation reports." OPRE's staff of 42 includes experts in research and evaluation methods as well as ACF programs and policies and the populations they serve. OPRE engages in on-going collaboration with program office staff and leadership to interpret research and evaluation findings and to identify their implications for programmatic and policy decisions. OPRE also provides written summaries of emerging findings and holds monthly meetings with agency and program leadership to discuss their implications.
- While OPRE oversees most of ACF's evaluation activity and provides overall coordination, some ACF program offices also sponsor evaluations. ACF's evaluation policy states, "In order to promote quality, coordination and usefulness in ACF's evaluation activities, ACF program offices will consult with OPRE in developing evaluation activities. Program offices will discuss evaluation projects with OPRE in early stages to clarify evaluation questions and methodological options for addressing them, and as activities progress OPRE will review designs, plans, and reports. Program offices may also ask OPRE to design and oversee evaluation projects on their behalf or in collaboration with program office staff."

CNCS:

- CNCS's [Office of Research and Evaluation](#) Director (R&E) oversees the development of social science research designed to measure the impact of CNCS programs and shape policy decisions; encourage a culture of performance and accountability in national and community service programs; provide information on volunteering, civic engagement, and volunteer management in nonprofit organizations; and assist in the development and assessment of new initiatives and demonstration projects. The R&E Director, who is overseeing R&E's \$4 million budget and a [staff](#) of 9 in FY16, is a member of CNCS's Leadership Team and Policy Council. The R&E Director also meets regularly with CNCS Program Directors to identify areas where evidence can be generated and used for various decisions.
- The R&E Director meets annually with all CNCS program offices to identify priorities and negotiate which pools of funds are need to support the year's priorities. The FY16 plan was developed through a series of formal and informal conversations.

MCC:

- MCC's [Monitoring and Evaluation](#) (M&E) Division, which falls within the [Department of Policy and Evaluation](#) (DPE), has a staff of 23 and an FY16 budget of \$20.6 million in due diligence (DD) funds to be used directly for measuring high-level outcomes and impacts in order to assess the effects of its programs and activities. Departments throughout the agency have a total of [\\$75 million](#) in DD funds in FY16. The [M&E Managing Director](#) as well as the Departmental [Vice President](#) have the authority to execute M&E's budget and inform policy decisions affecting independent evaluations. The M&E Managing Director participates in technical reviews of proposed investments as well as in regular monitoring meetings in order to inform policy and investment decisions. The Vice President sits on the Agency's Investment Management Committee which examines the evidence base for each investment before it is approved by the MCC Board and conducts regular oversight over the compact (i.e., grant program) development process.

EVIDENCE / EVALUATION CRITERIA

1. Leadership: Did the agency have a senior staff member(s) with the authority, staff, and budget to evaluate its major programs and inform policy decisions affecting them in FY16?

USAID:

- USAID's [Office of Learning, Evaluation and Research \(LER\)](#) in the [Bureau for Policy, Planning, and Learning \(PPL\)](#) provides guidance, tools and technical assistance to USAID staff and partners to support monitoring, evaluation and learning practices, some of which can be found [online](#). The LER Director oversaw approximately 20 staff and a \$17.5 million budget in FY15. (The FY16 budget is estimated to be close to the same level as in FY2015.)
- LER holds several contracts that USAID missions and offices can use for building staff capacity in monitoring, evaluation and learning, and for commissioning evaluations and monitoring services directly. For example, LER manages the Monitoring and Evaluation Services Indefinite Delivery Indefinite Quantity (EVAL-ME IDIQ) contract, which allows missions, using their own funds, to competitively bid statements of work among 14 pre-approved companies that have been selected for their monitoring and evaluation capabilities, shortening and simplifying the process for contracting an independent evaluation team. LER also manages a classroom training program in monitoring and evaluation for USAID staff.
- The LER Director participates in the USAID Administrator's Leadership Council (ALC), a senior level bi-weekly meeting chaired by the USAID Administrator and attended by Assistant Administrators and select Agency Senior Staff, when the agenda includes issues related to evaluation. The LER Director also informs policy decisions across the agency by providing input into working groups and reviewing statements, draft memos and other policy products.
- One of LER's primary objectives is to build USAID's capacity in the field of Monitoring, Evaluation and Learning. For example, under a contract to build Monitoring and Evaluation capacity at USAID (MECap) individual USAID Offices and Missions can access Monitoring & Evaluation Fellows and Learning Fellows. These fellows work with a specific mission or office for 6 months to up to 2 years. MECap can also field experts for short-term technical assistance for a specific monitoring or evaluation-related task, like evaluation design or developing a mission-wide performance management plan. Another contract held by LER, LEARN, provides support to missions to more intentionally learn from monitoring, evaluation and experience and apply that learning. To build staff capacity in designing or commissioning impact evaluations funded by missions or offices, LER has hosted clinics on Impact Evaluation to provide USAID field Missions with tools, resources and hands-on support to design an impact evaluation for a future program activity. In addition to providing general capacity-building services in the form of training, clinics, technical assistance, and fellowships, LER staff occasionally manage evaluations directly or participate on evaluation teams for evaluations funded by LER or for those funded by other parts of the Agency. LER also coordinates several cross-agency working groups organized to support Learning champions and monitoring and evaluation specialists throughout the Agency.

USED:

- ED's [Institute of Education Sciences \(IES\)](#), with a budget of \$618 million in FY16, supports research and conducts evaluations of ED's major programs, including impact evaluations. The Director of IES and the Commissioner of the National Center for Education Evaluation and Regional Assistance (NCEE) are supported by 10 staff who oversee these evaluations. The [Office of Planning, Evaluation, and Policy Development's \(OPEPD\) Program and Policy Studies Services \(PPSS\)](#) has a staff of 20 and serves as the Department's internal analytics office. PPSS conducts short-term evaluations to support continuous improvement of program implementation and works closely with program offices and senior leadership to inform policy decisions with evidence. While some evaluation funding – such as that for [Special Education Studies and Evaluations](#) – is appropriated to IES (\$10.8 million in FY16), most evaluations are supported by funds appropriated to ED programs. NCEE and PPSS staff work closely with program offices to design program evaluations that reflect program priorities and questions. Both IES and PPSS provide regular briefings on results to help ensure information can be used by program offices for program improvement.
- Both IES and PPSS sit on ED's Evidence Planning Group (EPG) with other senior staff from the ED's [Office of Planning, Evaluation, and Policy Development \(OPEPD\)](#) and the [Office of Innovation and Improvement \(OII\)](#). EPG reviews and advises programs and Department leadership on how evidence can be used to improve Department programs. Senior officials from IES, OII, and PPSS are part of ED's leadership structure and weigh in on major policy decisions. They play leading roles in the formation of the Department's annual budget requests, recommendations around grant competition priorities, including evidence, and providing technical assistance to Congress to ensure that evidence informs policy design.

EVIDENCE / EVALUATION CRITERIA

1. Leadership: Did the agency have a senior staff member(s) with the authority, staff, and budget to evaluate its major programs and inform policy decisions affecting them in FY16?

USHUD:

- HUD's [Office of Policy Development & Research](#) (PD&R) informs HUD's policy development and implementation by conducting, supporting, and sharing research, surveys, demonstrations, program evaluations, and best practices. PD&R achieves this mission through three interrelated core functions: (1) collecting and analyzing national housing market data (including with the Census Bureau); (2) conducting research, program evaluations, and demonstrations; and (3) providing policy advice and support to the HUD Secretary and program offices. PD&R is led by an Assistant Secretary who oversees six offices, about 149 staff including a team of field economists that work in HUD's 10 regional offices across the country, and a budget of \$108.1 million in FY16. The Assistant Secretary ensures that evidence informs policy development through frequent personal engagement with other principal staff, the Secretary, and external policy officials; HUDstat performance review meetings (see Question #4 below for a description); speeches to policy audiences, sponsorship of public research briefings, and policy implications memoranda. The Assistant Secretary also regularly engages with each HUD program office to ensure that metrics, evaluations, and evidence inform program design, budgeting, and implementation.
- Periodic PD&R meetings with program offices enable knowledge-sharing about evaluation progress and emerging needs for research, evaluation, and demonstrations. In recent years, Congress has authorized support for evaluations from program resources through set-asides, transfer authority, and supplemental appropriations to implement demonstrations.

USDOL:

- DOL's Chief Evaluation Officer is a senior official with responsibility for all activities of the [Chief Evaluation Office \(CEO\)](#), and coordination of evaluations Department-wide. CEO includes 15 full-time staff and contractors plus 1-2 detailees at any given time. The CEO is responsible for the appropriated budget for the Departmental Program Evaluation (\$10 million in FY16) and the Department's evaluation set-aside funds (\$30 million in FY16). In FY16, the CEO will directly oversee an estimated \$40 million in evaluation funding and collaborate with DOL agencies on additional evaluations being carried out through an additional \$15 million to evaluate Employment and Training Administration (ETA) pilots, demonstrations and research and evaluations of large grant programs including the Performance Partnership Pilots (P3), American Apprenticeship Initiative (AIA), the Trade Adjustment Assistance Community College and Career Training (TAACCCT) Grant Program, and Reentry Programs for Ex-Offenders. The CEO also participates actively in the performance review process during which each operating agency meets with the Deputy Secretary to review progress on performance goals established for the year required under Government Performance and Results Act (GPRA). The CEO's role is to incorporate evidence and evaluation findings as appropriate and to identify knowledge gaps that might be filled by evaluations or convey evidence that can inform policy and program decisions or performance.

EVIDENCE / EVALUATION CRITERIA

2. Evaluation and Research: Did the agency have an evaluation policy, evaluation plan, and research/learning agenda(s) and did it publicly release the findings of all completed evaluations in FY16?

ACF:

- ACF's [evaluation policy](#), established in 2012, addresses the principles of rigor, relevance, transparency, independence, and ethics and requires ACF program, evaluation, and research staff to collaborate. For example, the policy states, "ACF program offices will consult with OPRE in developing evaluation activities." And, "There must be strong partnerships among evaluation staff, program staff, policy-makers and service providers."
- ACF's Office of Planning, Research, and Evaluation (OPRE) proposes an evaluation plan to the Assistant Secretary each year in areas in which Congress has provided authority and funding to conduct research and evaluation.
- ACF's annual portfolio reviews describe recent work and ongoing learning agendas in the areas of [family self-sufficiency](#), [child and family development](#), and [family strengthening](#), including work related to [child welfare](#), [child care](#), [Head Start](#), [Early Head Start](#), [strengthening families](#), [teen pregnancy prevention and youth development](#), [home visiting](#), [self-sufficiency](#), [welfare and employment](#). Examples include findings from [Head Start CARES](#); the [BIAS project](#); multiple reports from the first nationally representative [study of early care and education](#) in over 20 years; [early findings](#) on the Maternal, Infant and Early Childhood Home Visiting program; and [a report on challenges and opportunities](#) in using administrative data for evaluation.
- ACF's evaluation policy requires that "ACF will release evaluation results regardless of findings... Evaluation reports will present comprehensive findings, including favorable, unfavorable, and null findings. ACF will release evaluation results timely – usually within two months of a report's completion." ACF has publicly released the findings of all completed evaluations to date. In 2015, OPRE released nearly [120 publications](#).

CNCS:

- CNCS has an [evaluation policy](#) that presents 5 key principles that govern the agency's planning, conduct, and use of program evaluations: rigor, relevance, transparency, independence, and ethics.
- CNCS has an evaluation plan/learning agenda that is updated annually based on input from agency leadership as well as from emerging evidence from completed studies. This agenda was shared with the CNCS Board in 2015 and is reflected in the CNCS Congressional Budget Justification for [Fiscal Year 2016](#) (pp. 55-56) and [Fiscal Year 2017](#) (pp. 5-6, 55-56). CNCS's R&E Office is currently developing scopes of work and will meet with program officers in April 2016 to discuss them.
- CNCS creates four types of reports for public release: research reports produced directly by research and evaluation staff, research conducted by third party research firms and overseen by research and evaluation staff, reports produced by CNCS-funded research grantees, and evaluation reports submitted by CNCS-funded program grantees. All reports completed and cleared internally are posted to the [Evidence Exchange](#). CNCS expects to release 34 additional reports in FY16, and all evaluations are expected to be cleared.
- In FY16 CNCS developed [Evaluation Core Curriculum Courses](#) which are presented to its grantees through a webinar series and is available on the CNCS website along with other [evaluation resources](#). The courses are designed to help grantees and other stakeholders easily access materials to aid in conducting or managing program evaluations.

EVIDENCE / EVALUATION CRITERIA

2. Evaluation and Research: Did the agency have an evaluation policy, evaluation plan, and research/ learning agenda(s) and did it publicly release the findings of all completed evaluations in FY16?

MCC:

- MCC has developed a [Policy for Monitoring and Evaluation of Compacts](#) and Threshold Programs in order to ensure that all programs develop and follow comprehensive Monitoring & Evaluation (M&E) plans that adhere to MCC's standards. The monitoring component of the M&E Plan lays out the methodology and process for assessing progress towards Compact (i.e., grant) objectives. It identifies indicators, establishes performance targets, and details the data collection and reporting plan to track progress against targets on a regular basis. The evaluation component identifies and describes the evaluations that will be conducted, the key evaluation questions and methodologies, and the data collection strategies that will be employed. Pursuant to MCC's M&E policy, every project must undergo an independent evaluation and analysis to assess MCC's impact. Once evaluation reports are finalized, they are published on the [MCC Evaluation Catalog](#). To date, fifty-three interim and final reports have been publicly released, with several additional evaluations expected to be completed and released in the coming months. MCC also produces periodic reports for internal and external consumption on results and learning, and holds agency-wide sessions that help to translate evaluation results into lessons learned for future compact development. Finally, in February 2016, MCC launched "[NEXT: A Strategy for MCC's Future](#)" which outlines [new strategic directions](#) on how it will invest more in strengthening feedback systems to harness this learning for ongoing adaptation of design and implementation, both for its own effectiveness and for the benefit of country partners and others in the development community. NEXT is designed to be a five-year strategic plan for MCC, but also includes MCC's learning agenda by incorporating agency-wide learning and knowledge goals to be pursued within that timeframe

USAID:

- USAID has an agency-wide [Evaluation Policy](#). The agency just released a [report](#) to mark the five-year anniversary of the policy.
- USAID field missions are required to have an evaluation plan, and all USAID missions and offices provide an internal report on an annual basis on completed, ongoing and planned evaluations, including evaluations planned to start anytime in the next three fiscal years. USAID provides a [Performance Management Plan \(PMP\) Toolkit](#) to assist missions worldwide.
- Given USAID's decentralized structure, individual programs, offices, bureaus and missions may develop learning agendas, which several have done, including the USAID's Bureau for Food Security for the US government's [Feed the Future initiative](#) and USAID's [Democracy, Human Rights, and Governance \(DRG\) Center](#). All Washington Bureaus have annual evaluation action plans that look at quality and use and identify challenges and the priorities for the year ahead.
- All final USAID evaluation reports are available on the Development Experience Clearinghouse except for approximately five percent of evaluations completed each year that are not public due to principled exceptions to the presumption in favor of openness guided by [OMB Bulletin 12-01 Guidance on Collection of U.S. Foreign Assistance Data](#).
- USAID is currently updating its operational policy for planning and implementing country programs. A key change in the policy is that missions will include a learning plan as part of their five-year strategic plan, also known as the CDCS. The plan will outline how missions will incorporate learning into their programming, including activities like regular portfolio reviews, evaluation tracking and dissemination plans, and other analytic processes to better understand the dynamics of their programs and their country contexts.

EVIDENCE / EVALUATION CRITERIA

2. Evaluation and Research: Did the agency have an evaluation policy, evaluation plan, and research/learning agenda(s) and did it publicly release the findings of all completed evaluations in FY16?

USED:

- ED's [Institute of Education Sciences](#) (IES) supports research and conducts evaluations of ED's major programs. IES' evaluation policies are set by the IES [Standards and Review Office](#), addressing issues of scientific quality, integrity, and timely release of reports. Related, the [National Board for Education Sciences](#), IES's advisory board, has approved policies for [Peer Review](#), which are implemented by the Standards and Review Office.
- EPG works with program offices and ED leadership on the development of ED's annual evaluation plan. This happens through the Department's annual spending plan process and through identification of high priority evaluations for use of the pooled evaluation authority. IES and PPSS work with programs to design and share results from relevant evaluations that help with program improvement.
- ED's current evaluations constitute its learning agenda.
- ED's evaluations are posted on the [IES](#) website and the [PPSS](#) website. See [FY15 Annual Performance Report and FY17 Annual Performance Plan](#) for a list of ED's current evaluations. IES publicly releases findings from all of its completed, peer-reviewed evaluations on the [IES website](#) and also in the [Education Resources Information Clearinghouse](#) (ERIC).
- ED's supports research through IES's [National Center for Education Research](#) (NCER), which makes grants for prekindergarten through postsecondary research and IES' [National Center for Special Education Research](#) (NCSEER), which sponsors a comprehensive program of special education research designed to expand the knowledge and understanding of infants, toddlers, children, and young adults with disabilities. IES also manages the Regional Educational Laboratory ([REL](#)) program, which supports districts, states, and boards of education throughout the United States to use research in decision making.

USHUD:

- HUD's [evaluation policy](#) (see pp. 1–6, 21, 23), which guides HUD's Research Roadmap described below, includes reaching out to internal and external stakeholders through a participatory approach; making research planning systematic, iterative, and transparent; focusing on research questions that are timely, forward-looking, policy-relevant, and leverage HUD's comparative advantages and partnership opportunities; aligning research with HUD's strategic goals; and using rigorous research methods including program demonstrations with randomized controlled trials as appropriate.
- HUD's Office of Policy Development and Research (PD&R) has developed the [Research Roadmap FY14-FY18](#), (see pp. 6-20) a strategic, five-year plan for priority program evaluations and research to be pursued given a sufficiently robust level of funding. PD&R also integrated its evaluation plan into HUD's [FY14-FY18 Strategic Plan](#) (see pp. 57-63) to strengthen the alignment between evaluation and performance management. During FY16, PD&R is using similar principles and methods to [refresh](#) the Roadmap to address emerging research topics.
- HUD also employs its role as [convener](#) to help establish frameworks for evidence, metrics, and future research.
- According to the [Research Roadmap FY14-FY18](#), (see p. 28), as part of HUD's annual performance report required by GPRA, "agencies should describe findings from agency-funded evaluations or other research completed during the prior fiscal year." Further, "Agencies are expected to have a web page on the agency's evaluations or links to other evaluations relevant to the agency's work with summaries of the findings and specific citations." PD&R publishes and disseminates evaluations in a timely fashion through these and other means, and also follows a policy of including language in research and evaluation contracts that allows researchers to independently publish results, even without HUD approval, after not more than 6 months.

USDOL:

- DOL has a formal [Evaluation Policy Statement](#) that formalizes the principles that govern all program evaluations in the Department, including methodological rigor, independence, transparency, ethics, and relevance. In addition, the Chief Evaluation Office publicly communicates the standards and methods expected in DOL evaluations in formal procurement statements of work.
- DOL also develops, implements, and publicly releases an annual Evaluation Plan (i.e., Department-level learning agenda), as do each of DOL's 17 operating agencies. The agency learning agendas form the basis for the DOL's Evaluation Plan. The [2016 Evaluation Plan](#) was released for public comment in the Federal Register and is posted on the CEO website.
- All DOL reports and findings are publicly released and posted on the [CEO website](#). DOL agencies also post and release their [reports](#).

EVIDENCE / EVALUATION CRITERIA

3. Resources: Did the agency invest at least 1% of program funds in evaluations in FY16?

(Note: Meeting this criteria requires both Agency and Congressional action.)

ACF:

- In FY16, ACF plans to spend \$138 million on evaluations, representing 0.3% of ACF's \$53 billion budget in FY16 (in addition to investments in evaluations by ACF grantees).
- The Administration's FY17 [budget request](#) seeks authority for numerous [new investments in learning](#), including set-asides of up to 1.5% of the Social Services Block Grant program (\$18.5m in FY17, including \$10 million for a demonstration and evaluation on supplying diapers to low-income families and \$8.5 million for research and evaluation in FY17) and 1% of the Community Services Block Grant program (\$3.5 million in FY17) for evaluations.

CNCS:

- CNCS plans to spend a total of \$5.1 million (representing .46% of CNCS's \$1.1 billion budget in FY16) in evaluation and evaluation capacity building activities (R&E evaluation and program funds combined), including:
 - \$1.2 million of Senior Corps funding for the supplemental award, program funding used for evaluation and evidence purposes versus funding given to sponsor organizations;
 - \$400,000 in Senior Corps funds for the longitudinal survey in FY16, an evaluation of the volunteers who participate in Senior Corps programs (examining their health and well-being outcomes over time);
 - \$500,000 in supporting reviews of grantee evaluation plans and reports, including for research & evaluation expertise to review studies submitted by grantees applying for funding; and
 - \$3 million in evaluation funds and SIF funds to support program evaluations and technical assistance for grantees to conduct evaluations.

MCC:

- In FY15, M&E invested over \$17.1 million on monitoring and evaluation of Compact projects, which amounted to 2.9% of Compact spending for FY15 (\$570.7 million). Calculations are still ongoing for FY16. However, MCC expects to disburse amounts similar to FY15. This is reflected in numbers for Q1 & Q2 in FY16, as of March 30, which show M&E investments of \$7.5 million.

USAID:

- In FY15, USAID missions and offices reported completing 244 evaluations with resources totaling approximately \$69.3 million and managing another 251 ongoing evaluations, many that span more than one year, with total ongoing budgets estimated to reach \$168.9 million. Overall spending on evaluations completed or ongoing in FY15 (\$238.2 million) represents about 1.1% of USAID's \$21.1 billion FY15 program budget.
- This amount does not include the Office of Learning, Evaluation, and Research budget which primarily focuses on evaluation capacity building and technical assistance (\$17.5 million FY15) or the investment in the [Demographic and Health Surveys](#) (DHS) (\$189 million total in FY13-FY18) or surveys funded by other sector programs that often make up some of the underlying data used in many evaluations.

EVIDENCE / EVALUATION CRITERIA

3. Resources: Did the agency invest at least 1% of program funds in evaluations in FY16?

(Note: Meeting this criteria requires both Agency and Congressional action.)

USED:

- There are a variety of ways that ED generally supports evaluations as well as evaluation technical assistance and capacity-building. In FY15 and FY16, ED has the authority to reserve up to 0.5% of ESEA funds – except Title I funds, Title III funds, and funds for programs that already have an evaluation provision – to evaluate ESEA programs (which RFA estimates at \$41.3 million for FY15). In FY15, ED pooled \$8.8 million to conduct evaluations that will build new evidence about the following programs: ESEA Title I, Part A; the migrant education program; and the Indian Education LEA Grants Program; and also provided continued support for program evaluations on ESEA Title I, Part A; ESEA Title I, Part D; and ESEA Title III, which began with FY14 pooled funding. The Every Student Succeeds Act (ESSA) of 2015, which reauthorized ESEA, continues the pooling authority and includes Title III as an allowable program from which to pool funds. ESSA also authorizes \$710,000 for an evaluation of Title I for FY17-FY20. ED spent over \$60 million on program evaluations in FY15.
- In addition, many EDq programs are authorized to support national activities, including program evaluations, and some programs encourage their grantees to conduct project-level evaluations. One of the key lessons from i3 has been that high-quality technical assistance for grantees on project-level evaluations is critical to producing credible information on project outcomes. In FY15 i3 invested more than \$4 million of its appropriation in evaluation technical assistance – virtually no other discretionary grant program has the authority or means to fund such a robust vehicle for technical assistance. ED, with the expertise of IES, has begun to pilot less expensive approaches to evaluation technical assistance for programs like [First in the World](#) (\$1.5 m), and [Supporting Effective Educator Development](#) (\$~800,000), which also tasks its grantees with producing rigorous project-level evaluations.
- According to RFA estimates, overall spending on evaluation (\$60 million in FY15) and evaluation technical assistance and capacity-building (\$6.3 million in FY15) represents 0.1% of ED's \$67.1 billion discretionary budget in FY15.

EVIDENCE / EVALUATION CRITERIA

3. Resources: Did the agency invest at least 1% of program funds in evaluations in FY16?

(Note: Meeting this criteria requires both Agency and Congressional action.)

USHUD:

- For FY16, Congress appropriated \$50 million for core research activities; \$10 million for research, evaluations, and demonstrations; and \$25 million for technical assistance in the Research & Technology account. This \$85 million total, half of the requested amount, equals 0.19 percent of HUD's \$45.5 billion of FY16 program [budget authority](#), net of Salaries and Expenses. The \$10 million devoted to research, evaluations, and demonstrations is about 12 percent of the \$85 million total. Additionally, much of the \$50 million is used for surveys (especially for the American Housing Survey) and other data acquisition that indirectly support evaluation of HUD's mission activities in domains such as affordable housing and housing finance.
- In FY10, Congress authorized the transfer of up to 1% of funds from individual HUD program funds to the Transformation Initiative (TI) Fund for: (1) research, evaluation, and program metrics; (2) program demonstrations; (3) technical assistance; and (4) information technology. After FY11, HUD no longer sought to fund information technology with the TI Fund, and Congress has not provided requested levels of evaluation funding or, since FY14, supported transfers to TI

USDOL:

- In FY 16, DOL's CEO will directly oversee an estimated \$40 million in evaluation funding. Additionally CEO will collaborate with DOL agencies on additional evaluations being carried out, with approximately \$15 million to evaluate Employment and Training Administration (ETA) pilots, demonstrations and research and evaluations of large grant programs, including, for example, the Performance Partnership Pilots (P3), American Apprenticeship Initiative (AIA), the Trade Adjustment Assistance Community College and Career Training (TAACCCT) Grant Program, and Reentry Programs for Ex-Offenders. The combined amount of \$55 million represents approximately .44% of DOL's FY16 discretionary budget of \$12.4 billion. (For many of the largest programs, however, up to 5% of their budgets is dedicated to program evaluation and related activities).
- DOL's Chief Evaluation Office directly funds evaluations and also combines CEO funds with agency funds to jointly sponsor some evaluations. The largest discretionary programs can use program funds for evaluations and technical assistance, often up to 5% by statute. For example, three separate rounds of grants funded by H1-B worker visa fees totaling about \$400 million in FY16 support training particular populations, such as high school students transitioning to work, long-term unemployed workers, and apprenticeship training, and between 3% and 7% of these grant funds (at least \$25 million) is expected to be invested in evaluations in FY16. Another example, in FY14 and FY15, up to 5% of the funds available for the workforce innovation activities were used for technical assistance and evaluations related to the projects carried out with these funds. The legislation provided further that the Secretary may authorize awardees to use a portion of awarded funds for evaluation, upon the Chief Evaluation Officer's approval of an evaluation plan. Further, several DOL agencies also have separate evaluation appropriations. DOL studies funded through individual agencies are also coordinated with DOL's CEO.
- The Administration's FY14-FY17 budget requests recommended allowing the U.S. Secretary of Labor to set aside up to 1% of all operating agencies' budgets for evaluations, coordinated by CEO. In FYs 2012-2015, Congress authorized the Secretary to set aside up to 0.5% of these funds for evaluations, in addition to the separate evaluation funds that exist in many DOL agencies. In FY16, Congress authorized DOL to set aside up to .75% of operating agency budgets in evaluations.

EVIDENCE / EVALUATION CRITERIA

4. Performance Management/Continuous

Improvement: Did the agency implement a performance management system with clear and prioritized outcome-focused goals and aligned program objectives and measures, and did it frequently collect, analyze, and use data and evidence to improve outcomes, return on investment, and other dimensions of performance in FY16?

ACF:

- ACF's performance management framework focuses on outcomes and aims for coordinated and results-oriented management and operations across all ACF programs. [ACF's Strategic Plan](#) establishes five priorities, which align with the [HHS Strategic Plan](#). ACF formally reviews progress toward its Strategic Plan goals every quarter. ACF's Strategic Plan establishes five priorities in support of the agency's mission of fostering health and well-being by providing federal leadership, partnership, and resources for the compassionate and effective delivery of human services. The five priorities are: 1) Promote economic, health, and social well-being for individuals, families, and communities; 2) Promote healthy development and school readiness for children, especially those in low-income families; 3) Promote safety and well-being of children, youth, and families; 4) Support underserved and underrepresented populations; and 5) Upgrade the capacity of ACF to make a difference for families and communities.
- ACF aims to develop performance measures that are meaningful and can be used by program managers, leadership, outside stakeholders, and Congress to assess and communicate progress. Results for these metrics are reported annually in the [ACF Congressional Budget Justification](#). ACF reports on a total of 156 performance measures (94 outcome measures and 62 output measures) in the FY17 Congressional Budget Justification. A selection of ACF performance measures is also highlighted as part of the [FY 2017 HHS Annual Performance Plan and Report](#), which describes HHS' progress toward achieving the goals and objectives described in the [FY 2014-2018 HHS Strategic Plan](#). This report includes the most recent results available at the end of FY15 for HHS, including ACF.
- As part of the FY17 President's Budget request, HHS announced the FY16-17 [HHS Priority Goals](#). ACF is the lead agency for the goal to "Improve the quality of early childhood programs for low-income children" in collaboration with the Substance Abuse and Mental Health Services Administration (SAMHSA) and the Health Resources and Services Administration (HRSA). On a quarterly basis, ACF provides updates on this Priority Goal on [Performance.gov](#). ACF also participates in the GPRAMA-required Strategic Objective Annual Review process. HHS maintains an internal performance dashboard where ACF provides regular performance updates on the 156 performance measures included in the annual ACF Budget Request.

CNCS:

- CNCS's performance management framework is described in the Congressional Budget Justification for [Fiscal Year 2016](#) (p.3) and [Fiscal Year 2017](#) (p.6).
- CNCS has a focused set of Agency-Wide Priority Measures derived from the 2011-2015 [Strategic Plan](#). Every CNCS Program contributes to the Agency-Wide Priority Measures. There are also specific grantee/sponsor measures that roll up into the Agency-Wide Priority Measures, which can be found in the [Agency-Wide Priority Measures chart](#). Grantees are required to select at least one national performance measure, and they are required to report performance measures data annually. CNCS encourages grantees to use these measure for continuous program improvement. CNCS uses the agency-wide priority measures to assess its own progress toward attaining the goals and objectives of its strategic plan.
- Additionally, CNCS produces [state profile reports](#), which provide a picture of agency resources in each state at a given point. These reports contain a number of priority indicators, including the number of participants engaged in national service activities as well as the amount of non-CNCS resources generated by the agency's programs. Along with its stakeholders, CNCS uses this information to understand the capacity of service available in different geographic regions and discuss related implications with key service partners.
- CNCS's Chief Operating Officer (COO) is currently piloting a proof of concept performance framework that aligns with GPRA. The COO is finalizing their objectives, measures, and targets, and they will be conducting quarterly performance reviews starting in the fourth quarter of FY16. The goal is to establish an effective performance framework within the COO, work agency-wide to implement a similar process, and have an enhanced performance management framework in place as CNCS begins its new Strategic Planning process in 2017.

EVIDENCE / EVALUATION CRITERIA

4. Performance Management/Continuous

Improvement: Did the agency implement a performance management system with clear and prioritized outcome-focused goals and aligned program objectives and measures, and did it frequently collect, analyze, and use data and evidence to improve outcomes, return on investment, and other dimensions of performance in FY16?

MCC:

- MCC monitors progress towards compact results on a quarterly basis using performance indicators that are specified in the Compact M&E Plans. The M&E Plans specify indicators at all levels (process, output, and outcome) so that progress towards final results can be tracked. Every quarter each country partner submits an [Indicator Tracking Table \(ITT\)](#) that shows actual performance of each indicator relative to the baseline level that was established before the activity began and the performance targets that were established in the M&E Plan. Some of the key performance indicators and their accompanying [data by country](#) are publicly available. MCC reviews this data every quarter to assess whether results are being achieved and integrates this information into project management decisions.
- MCC also supports the creation of multidisciplinary '[compact development teams](#)' to manage the development and implementation of each Compact program. Teams usually include the following members: Coordinator, economist, private sector development specialist, social inclusion and gender integration specialist, technical specialists (project specific), M&E specialist, environmental and social performance specialist, Legal, and financial management and procurement specialists. From the earliest stages, these teams develop project logics and M&E frameworks supported by data and evidence, and use them to inform the development of the projects within each Compact program. Teams meet frequently to gather evidence, discuss progress, make project design decisions, and solve problems; and they are encouraged to use the lessons from completed evaluations to inform their work going forward.
- MCC hosts regular "colleges" in which MCC counterparts from partnering countries are invited to a weeklong set of meetings and workshops to discuss best practices, strengthen collaboration, and improve strategies for effectively implementing projects..

USAID:

- USAID partners with the U.S. Department of State to jointly develop and implement clear strategic goals and objectives. USAID's Performance Improvement Officer (PIO) leads Agency efforts to use data for decision-making and improve performance and operational efficiency and effectiveness. The Assistant Administrator for the Management Bureau, [Angelique M. Crumbly](#), also serves as the Performance Improvement Officer. The Office of Management and Budget's circular A-11 "[Preparation, Submission, and Execution of the Budget](#)," Part Six describes the role of the PIO. Specifically, the PIO coordinates tracking of Cross Agency Priority (CAP) and Agency Priority Goal (APG) progress; leverages stat reviews, such as PortfolioStat, HRStat, and CyberStat, to conduct deep-dives into evidence; and oversees business process reviews and other assessments to ensure that the Agency more efficiently and effectively achieves its mission and goals.
- USAID's strategic plan, annual performance plan and report, and other performance reports are publicly available:
 - [Agency Joint Strategic Plan \(JSP\)](#)
 - [Agency Financial Report \(AFR\)](#)
 - [Annual Performance Plan and Report \(APR\)](#)
 - [Summary of Performance and Financial Information](#)
- USAID reports on three Agency Priority Goals and nine Cross Agency Priority Goals on [www.performance.gov](#). These goals help the Agency improve performance and cut costs, while holding the Agency accountable to the public. USAID assesses progress and challenges toward meeting the goals annually during data-driven reviews with Agency leadership. USAID also measures progress toward its [USAID Forward](#) reform agenda through eight public indicators, which help the Agency adapt business processes to improve performance.
- USAID field missions develop [Country Development Cooperation Strategies](#) (CDCS) with clear goals and objectives and a [performance management plan](#) that identifies expected results, performance indicators to measure those results, plans for data collection and analysis, and periodic review of performance measures to use data and evidence to adapt programs for improved outcomes.
- In addition to measuring program performance, USAID measures operations performance management to ensure that the Agency achieves its development objectives; aligns resources with priorities; and institutionalizes [USAID Forward](#) reforms.

EVIDENCE / EVALUATION CRITERIA

4. Performance Management/Continuous

Improvement: Did the agency implement a performance management system with clear and prioritized outcome-focused goals and aligned program objectives and measures, and did it frequently collect, analyze, and use data and evidence to improve outcomes, return on investment, and other dimensions of performance in FY16?

USED:

- ED develops a four-year strategic plan and holds quarterly data-driven progress reviews of the goals and objectives established in the plan, as required by the Government Performance and Results Act Modernization Act (GPRAMA) of 2010. ED's [FY14-18 Strategic Plan](#) includes a goal on the continuous improvement of the United States education system with objectives focused on enhancing the use of data, research, evaluation, and technology (see pp. 37-43). GPRMA also requires agencies to develop agency priority goals (APGs) and submit information on those goals to OMB on a quarterly basis. APGs reflect the top near-term performance priorities that agency leadership aims to accomplish within a two-year period. ED established an APG on enabling evidence-based decision-making (see [Performance.gov](#) for quarterly reporting on the APGs) and, in March 2016, decided to continue its work on this APG for FY16-17. Once established the metrics for the APGs are included in the strategic plan. For example, strategic objective 5.3 in the Department's current four-year strategic plan, which is part of the continuous improvement goal referenced above, includes the metrics for the evidence APG. Although many of the metrics in the strategic plan are annual, the Department uses the quarterly reviews to discuss data available and milestones achieved.

USHUD:

- HUD conducts regular data-driven performance reviews—"HUDStat" meetings—that focus on quarterly progress toward achieving each of HUD's priority goals. The HUD Secretary and senior leadership from throughout the agency, and sometimes from partner agencies, attend these meetings to address challenges, review metrics, improve internal and external collaboration, and increase performance. Strategic goals and two-year priority goals are [publicly posted](#). HUD documents alignment between strategic goals and supporting objectives and metrics in the consolidated [Annual Performance Plan-Annual Performance Report](#), and identifies the staff assigned lead responsibility for each objective.

USDOL:

- DOL's [Performance Management Center](#) (PMC) is responsible for the Department's extensive performance management system, which includes over 400 measures whose results are reviewed quarterly by the Deputy Secretary. PMC's activities are intended to improve DOL's program performance through data-driven analysis, sharing best practices, and implementing activities associated with the Government Performance and Results Modernization Act of 2010 (GPRA). Using a PerformanceStat-type reporting and dashboard system, PMC coordinates quarterly meetings between the Deputy Secretary and each agency head, to review performance results and analysis of the priority performance measures contributing to DOL's strategic goals, to make commitments related to performance improvement, and to follow up on the progress of previous performance improvement commitments. PMC also oversees the [Strategic Planning process](#) and analyzes performance data in collaboration with agencies to achieve continuous performance improvement. CEO actively participates in the quarterly performance reviews to incorporate findings from evaluations as appropriate.
- One of the most important roles that DOL's CEO plays is to facilitate the interaction between program and evaluation analysts, and performance management and evaluation. Learning agendas updated annually by DOL agencies in collaboration with DOL's CEO include program performance themes and priorities for analysis needed to refine performance measures and identify strategies for improving performance. The quarterly GPRA meetings with the Deputy Secretary routinely include specific discussions about improving performance and findings from recent evaluations that suggest opportunities for improvement.
- To promote the use of evidence based strategies DOL's Employment and Training Administration (ETA) also continues to manage the [Workforce Systems Strategies](#) website, which identifies a range of potential strategies informed by research evidence and peer exchanges to support grantees in providing effective services to customers.

EVIDENCE / EVALUATION CRITERIA

5. Data: Did the agency collect, analyze, share, and use high-quality administrative and survey data - consistent with strong privacy protections - to improve (or help other entities improve) federal, state, and local programs in FY16?

ACE:

- ACF has made numerous administrative and survey datasets publicly available for secondary use, such as data from the [National Survey of Early Care and Education](#), [Child Care and Development Fund](#), [National Survey of Child and Adolescent Well-Being](#), and [Adoption and Foster Care Analysis and Reporting System](#), among many other examples.
- ACF's [Interoperability Initiative](#) supports data sharing through policies and guidelines to accelerate adoption; standards and tools that are reusable across the country; field-based pilots; and addressing common privacy and security requirements to mitigate risks.
- Several ACF divisions have also been instrumental in supporting cross-governmental efforts, such as the [National Information Exchange Model \(NIEM\)](#) that will enable human services agencies to collaborate with health, education, justice, and many other constituencies that play a role in the well-being of children and families.
- ACF's National Directory of New Hires has entered into data sharing agreements with numerous agencies. For example, DOL's CEO and ETA have interagency agreements with HHS-ACF for sharing and matching earnings data on 9 different formal net impact evaluations. The [NDNH Guide for Data Submission](#) describes an agreement with the Social Security Administration to use its network for data transmission. Also, ACF Administers the [Public Assistance Reporting Information System](#), a platform for exchange of data on benefits receipt across ACF, Department of Defense, and Veterans Affairs programs. This platform entails data sharing agreements between these three federal agencies and between ACF and state agencies.
- The Administration's FY17 budget request includes \$261 million over five years for human services data interoperability, including grants for Statewide Human Services Data Systems and a Systems Innovation Center.

CNCS:

- As the nation's largest grant maker for service and volunteering, CNCS collects data about service program members, volunteers, and the organizations in which members and volunteers are placed. Member/volunteer demographic, service experience, and outcome data are collected in a variety of ways – both through administrative processes and through surveys:
 - In FY16 data collected from a revised member exit survey allowed CNCS to generate more accurate reports on key experiences and anticipated college, career, and civic engagement outcomes, which were shared internally. Survey results are being shared with program and agency leadership in FY16 for program improvement purposes. In FY16 R&E will also begin generating state-level reports for its State Commissions. The longer-term goal is to finalize response rate standards across the AmeriCorps programs so that data sets can be made available for public use in FY17.
 - A report summarizing cross-sectional survey findings on Senior Corps Foster Grandparents and Senior Companion Program volunteers will be released in FY16. The paper compares health, mobility disability, and life satisfaction between participants in both programs; and examines how their health status differs from similar adult volunteers and non-volunteers in the general population (a matched sample of volunteers and non-volunteers from the Health and Retirement Study (HRS). A longitudinal survey of volunteers in these 2 Senior Corps programs was implemented in FY15, and preliminary findings are expected in FY16.
 - For the first time, results from the redesigned AmeriCorps member exit survey were merged with administrative data sets on member demographics, program characteristics, and service locations to produce a new unified data set that currently has almost 70,000 observations. Analysis began in FY16, and preliminary findings are expected by the end of FY16.
 - Findings from an [alumni outcome survey pilot](#) were published in FY16.
- In FY16, CNCS's R&E Office is executing a new administrative data match between a sample of AmeriCorps alumni records and postsecondary outcome data from the National Student Clearinghouse. R&E also plans to execute a second administrative data match between alumni records and the Census' LEHD dataset to obtain employment and employment sector outcomes for AmeriCorps alumni. Although R&E currently relies on surveys, CNCS would prefer to reduce its reliance on this method so that key college and career outcomes can be obtained from more objective sources and for less cost.
- CNCS's [Office of Research and Evaluation](#) (R&E) makes publicly available (1) [state profiles](#) that depict national service resources (grant funds, members, volunteers, grantees) and program performance metrics across the country and (2) [volunteering statistics](#) at the local, state, and national levels collected for CNCS by the U.S. Census Bureau through an interagency agreement. ((<https://www.volunteeringinamerica.gov/>))

EVIDENCE / EVALUATION CRITERIA

5. Data: Did the agency collect, analyze, share, and use high-quality administrative and survey data - consistent with strong privacy protections - to improve (or help other entities improve) federal, state, and local programs in FY16?

MCC:

- MCC's M&E Division oversees the upload of anonymized evaluation data to MCC's public [Evaluation Catalog](#). There, partner countries, as well as the general public, can access spreadsheets that show [economic rates of return](#) calculations, performance [indicator tracking tables](#), results of [independent evaluations](#) for MCC-funded projects, and public use versions of the data used in those evaluations. All evaluation data is meticulously reviewed by MCC's internal [Disclosure Review Board](#) prior to posting to ensure that respondents' privacy is protected.
- As part of its [Data2x commitment](#), MCC and other donors are increasing the amount of gender data released and helping to improve international data transparency standards.
- MCC is also a founding partner of the [Governance Data Alliance](#), a collaborative effort by governance data producers, consumers, and funders to improve the quality, availability, breadth, and use of governance data.
- MCC also has a partnership with the President's Emergency Plan for AIDS Relief (PEPFAR) which is helping to increase the availability and quality of development-related data in selected countries. MCC partnered with PEPFAR to create [local data hubs](#) that would engage stakeholders around the availability, accessibility and analysis of data. The data hubs have a local board drawn from partner country governments, the private sector and civil society. The hubs will comprise both a physical space for data analysts and other staff and virtual engagement among such stakeholders as donors, foundations, researchers, and NGOs.
- MCC also hosted a publicly available webinar, "[Monitoring and Evaluation in the Water Sector](#)," in which a presentation was given on MCC's rigorous evidence-based approach to monitoring and evaluation, followed by a closer look at lessons learned in the water sector and a discussion of ways in which monitoring and evaluation can contribute to aid effectiveness.

USAID:

- USAID has an [open data policy](#) which:
 - Establishes the [Development Data Library](#) (DDL) as the Agency's repository of USAID-funded, machine readable data created or collected by the Agency and its implementing partners;
 - Requires USAID staff and implementing partners (via associated changes to procurement instruments) to submit datasets generated with USAID funding to the DDL in machine-readable, non-proprietary formats;
 - Implements a data tagging protocol in keeping with the President's Executive Order and Office of Management and Budget policy on Open Data;
 - Defines a data clearance process to ensure that USAID makes as much data publicly available as possible, while still affording all protections for individual privacy, operational and national security, and other considerations allowable by law; and
 - Ensures data is updated quarterly, at minimum.
- In November 2011, the United States became a signatory to the [International Aid Transparency Initiative](#) (IATI). IATI developed a standard for publishing foreign assistance spending data that allows for comparison across publishers. [Publish What You Fund](#) (PWYF), a United Kingdom-based nongovernmental organization advocating for greater aid transparency, assesses 60+ bilateral and multilateral donors' overall commitment to aid transparency and the information they publish in an annual [Aid Transparency Index](#) (ATI). In 2014, USAID ranked 31st out of 68 donors and was at the bottom of the "Fair" category. In July 2015, USAID produced a [cost management plan](#) (CMP) in order to improve its reporting to IATI and, thereby, improve the Agency's score in the ATI. The plan elaborates on the necessary requirements (for example, political movement/discussions, technical work, system upgrades) and estimated timeline for implementation to advance in these areas. Recognizing the level of effort involved with the improvements varies greatly, the CMP outlines a four-phased approach. USAID is already seeing results. USAID's score in PWYF's 2015 Aid Transparency Review jumped by more than 20 points, propelling USAID to the "Good" category.
- USAID continues to expand the data it publishes on [ForeignAssistance.gov](#) (The Foreign Assistance Dashboard) and the [International Aid Transparency Initiative](#). USAID recently launched the [Foreign Aid Explorer](#) which shares 40 years of data through an easy to navigate website. USAID publishes its core datasets, as well as program specific data, in application program interface (API) formats. In 2014, USAID also began publicly sharing data files and its open data plan through its new [Open Government website](#) as part of the U.S. Government's open data initiative.

EVIDENCE / EVALUATION CRITERIA

5. Data: Did the agency collect, analyze, share, and use high-quality administrative and survey data - consistent with strong privacy protections - to improve (or help other entities improve) federal, state, and local programs in FY16?

USAID (cont.):

- The USAID [GeoCenter](#) uses data and analytics to improve the effectiveness of USAID’s development programs by geographically assessing where resources will maximize impact. The GeoCenter team works directly with field missions and Washington-based bureaus to integrate geographic analysis into the strategic planning, design, monitoring, and evaluation of USAID’s development programs. To date, the GeoCenter has leveraged \$32 million worth of high-resolution satellite imagery for development projects, at no cost to the Agency.
- USAID’s [Economic Analysis and Data Services](#) (EADS) unit has a public web site to share data and also provides data analysis tools. The unit also works to provide analysis upon request. In particular, the International Data and Economic Analysis part of EADS provides USAID staff, partners, and the public with analytical products and a platform for querying data.
- USAID uses data to inform policy formulation, strategic planning, project design, project management and adaptation, program monitoring and evaluation, and learning what works. The [Program Cycle](#) is USAID’s particular framing and terminology to describe this set of processes and the use of data and evidence to inform decisions is a key part of the process.
- USAID’s [Monitoring Country Progress](#) (MCP) system is an empirical analytical system which tracks and analyzes country progress along five dimensions: (1) economic reforms; (2) governing justly and democratically; (3) macro-economic performance; (4) investing in people; and (5) peace and security. It is used to facilitate country strategic planning including country graduation from USG foreign assistance programs.
- USAID has also begun publishing funding data alongside program results on the [Dollars to Results](#) page of the USAID website. Dollars to Results provides information on USAID’s impact around the world by linking annual spending (inputs) to results (outputs and outcomes) in some of the more than 100 developing countries where we work. There are plans to expand Dollars to Results in the future. Due to the nature of foreign assistance programs, it is difficult to directly link Fiscal Year disbursements to Fiscal Year results. There is often a time lag between when a dollar is disbursed and when a result is achieved from that investment. For example, if USAID builds a school, most of the spending takes place in the first several years of the project as construction begins. However, results may not be achieved until years later when the school opens and classes begin. Results shown on the website give a snapshot of the type of results achieved by USAID.
- To help inform the U.S. Government’s aid transparency agenda, USAID conducted three aid transparency country pilot studies in [Zambia \(May 2014\)](#), [Ghana \(June 2014\)](#), and [Bangladesh \(September 2014\)](#). The country pilots assessed the demand for and relevance of information that the U.S. Government is making available, as well as the capacity of different groups to use it. The [final report](#) summarizes findings from the three pilots and provides recommendations to help improve the transmission of foreign assistance data to ensure that the transparency efforts of the U.S. Government create development impact.

EVIDENCE / EVALUATION CRITERIA

5. Data: Did the agency collect, analyze, share, and use high-quality administrative and survey data - consistent with strong privacy protections - to improve (or help other entities improve) federal, state, and local programs in FY16?

USED:

- ED has several resources to support the high-quality collection, analysis, and use of high-quality data in ways that protect privacy. IES' [National Center for Education Statistics](#) (NCES) serves as the primary federal entity for collecting and analyzing data related to education. Almost all of ED's K-12 statistical and programmatic data collections are now administered by NCES via [EDFacts](#). NCES also collects data through national and international [surveys](#) and [assessments](#). Administrative institutional data and statistical sample survey data for postsecondary education is collected through NCES in collaboration with the [Federal Student Aid Office](#) (FSA). NCES data are made publicly available [online](#) and can be located in the ED [Data Inventory](#). Some data are available through public access while others only through [restricted data licenses](#). ED's Office for Civil Rights conducts the [Civil Rights Data Collection](#) (CRDC) on key education and civil rights issues in our nation's public schools. Additionally, the Data Strategy Team helps to coordinate data activities across the Department and the [Disclosure Review Board](#), the [Family Policy Compliance Office](#) (FPCO), the EDFacts Governing Board, and the [Privacy Technical Assistance Center](#) all help to ensure the quality and privacy of education data.
- ED has made concerted efforts to improve the availability and use of its data in FY16. With the release of the new [College Scorecard](#), the Department now provides newly combined data in a tool that helps students choose a school that is well-suited to meet their needs, priced affordably, and consistent with their educational and career goals. Additionally, the College Scorecard promotes the use of open data by providing the underlying data in formats that researchers and developers can use. This effort is a model for future releases of education data, and led to ED's new effort, InformED, to improve Department capacity to release data in innovative and effective ways to improve public use of data. InformED was part of the [FY17 budget](#) request (see p. 78).
- ED has several data sharing agreements with other agencies. For example, ED and the U.S. Department of Treasury match Federal Student Aid data with administrative Internal Revenue Service tax records to calculate earnings information by postsecondary institution for the [College Scorecard](#) consumer tool. This agreement allows ED to annually update and publish data on mean earnings, median earnings, and fraction not working among all students who received Title IV aid (i.e., federal grants and loans). ED and the U.S. Department of Labor are engaged in a joint federal/state workgroup that is developing help for data sharing at the state level through the new State Wage Interchange System (SWIS) for the Workforce Innovation and Opportunity Act (WIOA). For calculating the Gainful Employment (GE) debt-to-earnings metric, the Department of Education obtains from the Social Security Administration (SSA) annual earnings of students who completed a GE program. ED submits the Social Security numbers of students who received Title IV aid (i.e., federal grants and loans) to SSA in order to calculate the highest of mean and median earnings for each program.
- Additionally, ED administers the [Statewide Longitudinal Data System](#) (SLDS) program (\$34.5 million in FY16), which provides grants to states to develop their education-related data infrastructure and use these data for education improvement..

EVIDENCE / EVALUATION CRITERIA

5. Data: Did the agency collect, analyze, share, and use high-quality administrative and survey data - consistent with strong privacy protections - to improve (or help other entities improve) federal, state, and local programs in FY16?

USHUD:

- The HUD USER web portal continues to provide researchers, practitioners, and the public with [PD&R datasets](#) including the American Housing Survey, HUD median family income limits, and Picture of Subsidized Households tabulations at multiple geographic levels, as well as microdata from research initiatives on topics such as housing discrimination, the HUD-insured multifamily housing stock, and the public housing population. To help users identify which data are useful to them, [reference guides](#) identify datasets and characterize their relevance and usefulness for research in designated categories.
- HUD's Office of Policy Development and Research (PD&R) has authority to enter into cooperative agreements with research organizations, including both funded [Research Partnerships](#) and unfunded [Data License Agreements](#), to support innovative research projects that leverage HUD's data assets and inform HUD's policies and programs. A dedicated subject-matter expert is available to answer questions for those seeking a data license.
- HUD's PD&R and the National Center for Health Statistics at the Centers for Disease Control have successfully linked HUD administrative data for assisted renters with respondents to two national health surveys and made the [linked](#) data available to researchers to begin building a picture of tenant health issues.
- HUD is involved in a wide array of data-sharing agreements, including geocoding services provided by HUD's Geocoding Service Center; a recent agreement with the U.S. Department of Health and Human Services to pilot an administrative data linkage with Medicare and Medicaid utilization records; national compilation of local point-in-time counts of homeless individuals and administrative data from homeless service providers using Homeless Management Information Systems; collection of tenant data for Low-Income Housing Tax Credit properties from state housing finance agencies; an ongoing agreement with Actionable Intelligence for Social Policy to develop integrated data systems for policy analysis and program reform, including local education data; and a multiagency federal agreement under development about protocols for information security in data-sharing.

EVIDENCE / EVALUATION CRITERIA

5. **Data:** Did the agency collect, analyze, share, and use high-quality administrative and survey data - consistent with strong privacy protections - to improve (or help other entities improve) federal, state, and local programs in FY16?

USDOL:

- DOL's [Bureau of Labor Statistics](#) (BLS) (approximately \$600 million in FY16) serves as the principal Federal agency responsible for measuring labor market activity, working conditions, and price changes in the economy. BLS has [111 Cooperative Agreements](#) with 50 States and 4 Territories for labor market and economic data sharing, 505 "letters of agreement" on data usage with academics to conduct statistical research, and [data sharing agreements](#) with the Bureau of Economic Analysis and the Census Bureau.
- DOL's Employment and Training Administration (ETA) has [agreements with 52 States and Territories](#) for data sharing and exchange of wage data for performance accountability purposes.
- DOL's CEO, Employment Training Administration (ETA), and the Veterans Employment and Training Service (VETS) have worked with the U.S. Department of Health and Human Services (HHS) to develop a secure mechanism for obtaining and analyzing earnings data from the Directory of New Hires. In this past year DOL has entered into interagency data sharing agreements with HHS and obtained data to support 9 job training and employment program evaluations (Reemployment Assistance Demonstration Evaluation with unemployment insurance claimants, Young Parents Demonstration Evaluation, Enhanced Transitional Jobs Program Evaluation, Youthbuild Evaluation, Workforce Investment Act Evaluation, Green Jobs/Health Care Demonstration Evaluation, Re-entry for Ex-Offenders Evaluation, Transition Assistance Program for separating activity duty military persons, and the Job Training Scorecard Feasibility Study).
- DOL's worker protection agencies have open-data provisions on enforcement activity for firms from DOL's five labor enforcement agencies online and accessible through the [Enforcement Data Base](#) (Mine Safety and Health Administration, Wage and Hour Division, Occupational Safety and Health Administration, and the Employee Benefits Security Administration).
- The privacy provisions for BLS and DOL's Employment and Training Administration (ETA) are publicly available [online](#).
- In FY16, DOL expanded efforts to improve the quality of and access to data for evaluation and performance analysis through the Data Analytics Unit in DOL's CEO office, and through new pilots beginning in BLS to access and exchange state labor market and earnings data for statistical and evaluation purposes. The Data Analytics unit has also developed the Data Exchange and Analysis Platform (DEAP) with high processing capacity and privacy provisions to share, link, and analyze program and survey data across DOL programs and agencies and with other agencies. Internal use of DEAP is available now and public access will be available in the future.
- The Workforce Innovation Opportunity Act (WIOA) calls for aligned indicators of performance for WIOA authorized programs. DOL's Employment and Training Administration has worked within DOL and with the U.S. Department of Education to pursue the deepest WIOA alignment possible, including indicators definitions, data elements, and specifications to improve the quality and analytic value of the data. DOL chose to include several additional DOL programs in this process, which will result in unprecedented alignment of data and definitions for 13 federal programs (11 DOL and 2 Education). DOL and ED have issued the [proposed rule](#) for public comment and will finalize it in late spring 2016, and has also issued the related [Information Collection Requests](#) for public comment, and expect to finalize those Information Collection requires prior to that date.
- ETA continues funding and technical assistance to states under the [Workforce Data Quality Initiative](#) to link earnings and workforce data and education data longitudinally. ETA and DOL's Veteran's Employment and Training Service have also modified state workforce program reporting system requirements to include data items for a larger set of grant programs, which will improve access to administrative data for evaluation and performance management purposes. An example of the expanded data reporting requirements is the [Homeless Veterans Reintegration Program](#) FY16 grants.

EVIDENCE / EVALUATION CRITERIA

6. Common Evidence Standards/What Works

Designations: Did the agency use a common evidence framework, guidelines, or standards to inform its research and funding decisions and did it disseminate and promote the use of evidence-based interventions through a user-friendly tool in FY16?

ACF:

- ACF has established a [common evidence framework](#) adapted for the human services context from the framework for education research developed by the U.S. Department of Education and the National Science Foundation. The ACF framework, which includes the six types of studies delineated in the ED/NSF framework, aims to (1) inform ACF's investments in research and evaluation, and (2) clarify for potential grantees and others the expectations for different types of studies.
- ACF maintains an online [clearinghouse](#) of evidence reviews of human services interventions. These reviews rate the quality of evaluation studies using objective standards vetted by technical experts and applied by trained, independent reviewers, and similar to those used by other agencies such as the U.S. Department of Education's What Works Clearinghouse and the U.S. Department of Labor's CLEAR. The clearinghouse includes results of the reviews in a searchable format as well as comprehensive details about the review standards and process. Reviews to date have covered [teen pregnancy prevention](#); [home visiting](#); [relationship education and responsible fatherhood](#); and [employment and training](#); and include both ACF-sponsored and other studies.

CNCS:

- CNCS's Office of Research and Evaluation (R&E) Office is actively involved with 3 other federal agencies in the interagency Common Evidence Framework working group in order to ensure consistency in definitions and use of evidence standards in grant-making. CNCS uses the [Cross-agency Federal Evidence Framework](#) for evaluation planning and dissemination.
- CNCS also adapted the evidence framework used by its Social Innovation Fund and the Investing in Innovation Fund at ED and included it as part of the AmeriCorps State and National program's [FY16 grant competition](#). The evidence framework used in the FY16 AmeriCorps competition was revised from FY15 to make it more consistent with what is used in other federal agencies.
- In March 2015, CNCS released Phase I of the CNCS [Evidence Exchange](#), a virtual repository of reports intended to help CNCS grantees and other interested stakeholders find information about evidence- and research- based national service and social innovation programs. Phase 1 includes a database of single study reports with some additional descriptive information about the study, as well as a systematic review of the national service evidence base. Phase 2 in FY16 added studies as grantees completed their independent evaluations and submitted reports to CNCS.

MCC:

- MCC uses common, rigorous, evidence-based selection criteria to ensure objectivity in country selection for grant awards. To be eligible for selection, countries must first pass the MCC [scorecard](#) – a collection of 20 independent, third-party developed indicators that objectively measure a country's policy performance in the areas of economic freedom, investing in its people, and ruling justly. The criteria for passing the scorecard are applied universally to all candidate countries. MCC's Board of Directors then considers [3 key factors](#) for selecting countries: 1) a country's performance on the scorecard; 2) the opportunity to reduce poverty and generate economic growth; and 3) availability of funds. An in-depth description of the country selection procedure can be found in the annual [Selection Criteria and Methodology](#) report.
- MCC's model is based on a set of [core principles](#) essential for development to take place and for development assistance to be effective – good governance, country ownership, focus on results, and transparency. In pursuing these, MCC has created a [Principles into Practice](#) series which describes how to make these principles operational. Finally, all of MCC's evaluations are then published on the [MCC Evaluation Catalog](#). Associated data, upon which evaluations are based, are published when confidentiality concerns are adequately addressed.
- MCC is also developing an enhanced consolidated results framework that will assist it in telling the full picture of the impact of its programs and enrich programmatic learning. Currently in draft form, the framework will help MCC consolidate impacts across projects, compacts and sectors to assess an overall impact at an organizational level..

EVIDENCE / EVALUATION CRITERIA

6. Common Evidence Standards/What Works

Designations: Did the agency use a common evidence framework, guidelines, or standards to inform its research and funding decisions and did it disseminate and promote the use of evidence-based interventions through a user-friendly tool in FY16?

USAID:

- USAID has a scientific [research policy](#) that sets out quality standards for research. USAID's [Program Cycle guidance](#) includes specific evidence standards for strategic planning, project design, [monitoring](#), and [evaluation](#). For example USAID has [guidance](#) that requires evidence and data to assess the development context, challenges, and opportunities in all of USAID's country strategies. Similarly, all USAID projects must include a detailed [analytical phase](#) in the Project Appraisal Document.
- USAID does most of its Agency-wide engagement around evidence and frameworks for "what works" through its board membership and funding (along with other donors) of the [International Initiative for Impact Evaluations](#) (3ie) which funds impact evaluations and systematic reviews that generate evidence on what works in development programs and why. Rather than creating a separate "what works" clearinghouse, USAID has chosen to work with 3ie and other development partners to support 3ie's [database of impact evaluations](#) relevant to development topics (includes over 2,500 entries to date), [knowledge gap maps](#) and [systematic reviews](#) that pull the most rigorous evidence and data from across donors. 3ie also houses a collection of [policy briefs](#) that examine findings from its [database of impact evaluations](#) on overarching policy questions to help policymakers and development practitioners improve development impact through better evidence.
- USAID technical bureaus provide guidance based on evidence of "what works" by sector that applies to all relevant Agency programs. USAID's Bureau for Democracy, Conflict and Humanitarian Assistance (DCHA), for example, includes the [Center of Excellence on Democracy, Rights, and Governance](#), which publishes evidence-based standards for what works in this field. The DRG Center convenes leading scholars from a range of fields to work with USAID to study, analyze, and assess the effectiveness of its initiatives and programs in DRG, using this data to shape programming. In addition, USAID established the Evaluating Democracy and Governance Effectiveness (EDGE) Initiative, with the objective to supply and apply sophisticated tools to measure the impact of democracy, human rights, and governance work, and infuse evidence-based programmatic decision-making throughout the DRG portfolio. In another example, USAID's Global Health Bureau has a [strategic framework](#) that presents details in Annex 1 on specific evidence-based strategies, targets, and approaches for achieving goals within each technical area under the health priorities.
- Several USAID Bureaus also synthesize all the evaluations relevant to a specific sector to summarize key findings and identify gaps in knowledge that then inform sector learning agendas. For example, in March, the Bureau for Food Security (BFS) published a [synthesis report](#) summarizing findings from 196 evaluations of Feed the Future projects that focused on the six themes outlined in the BFS Learning Agenda. Across the themes, the synthesis illuminated trends and patterns summarized in the points found below the graphic. These trends can be shared with relevant staff and stakeholders engaged in designing new projects, or updating sector strategies and policies. The synthesis also identified gaps where more evaluation research is needed, helping to inform the design of future evaluations that can contribute to the body of knowledge on food security to improve the design and management of interventions in the agriculture and nutrition sectors by specifically addressing Learning Agenda questions.

USED:

- ED's evidence standards for its grant programs, as outlined in the Education Department General Administrative Regulations ([EDGAR](#)), build on ED's [What Works Clearinghouse™](#) (WWC) evidence standards. ED often includes these evidence standards in its discretionary grant competitions to direct funds to applicants proposing to implement projects that have evidence of effectiveness and/or to build new evidence through evaluation (see Question #8 below for more detail). Additionally, IES and the National Science Foundation issued a joint report that describes six types of research studies that can generate evidence about how to increase student learning in 2013. These principles are based, in part, on the research goal structure and expectations of IES's National Center for Education Research (NCER) and National Center for Special Education Research (NCSEER). NCER and NCSEER communicate these expectations through their [Requests for Applications](#) and [webinars](#) that are archived on the IES website and available to all applicants.
- ED's [What Works Clearinghouse™](#) (WWC) identifies studies that provide credible and reliable evidence of the effectiveness of a given practice, program, or policy (referred to as "interventions"), and disseminates summary information and reports on the WWC website. The WWC has reviewed more than 11,325 studies that are available in a [searchable database](#).

EVIDENCE / EVALUATION CRITERIA

6. Common Evidence Standards/What Works

Designations: Did the agency use a common evidence framework, guidelines, or standards to inform its research and funding decisions and did it disseminate and promote the use of evidence-based interventions through a user-friendly tool in FY16?

USHUD:

- HUD's [Policy Development and Research \(PD&R\)](#) office provides evidence of "what works" primarily through [HUD USER](#), a portal and web store for program evaluations, case studies, and policy analysis and research; the Regulatory Barriers Clearinghouse; and through initiatives such as Innovation of the Day, Sustainable Construction Methods in Indian Country, and the Consumer's Guide to Energy-Efficient and Healthy Homes. This content is designed to provide current policy information, elevate effective practices, and synthesize data and other evidence in accessible formats. Through these resources, researchers and practitioners can see the full breadth of work on a given topic (e.g., rigorous established evidence, case studies of what's worked in the field, and new innovations currently being explored) to inform their work.

USDOL:

- DOL uses the [Cross-agency Federal Evidence Framework](#) for evaluation planning and dissemination.
- DOL's [Clearinghouse for Labor Evaluation and Research \(CLEAR\)](#) is an internet-based evidence clearinghouse of evaluation reports that reviews designs, methodologies, and findings according to specific standards developed by technical work groups. Each study is scored and given a "causal evidence rating" according to the scoring rubric in the standards. CLEAR is a user-friendly, searchable website, that includes academic quality reviews for each study included in the system, appropriate for peer academic researchers, potential evaluation contractors submitting technical proposals, program practitioners seeking information on "what works", policy makers, and the general public.
- DOL uses the CLEAR evidence guidelines and standards when discretionary program grants awarded using evidence-informed or evidence-based criteria. The published guidelines and standards are thus used in grants for evidence-based programs demonstrations and in reviewing evaluations in the structured evidence reviews conducted in CLEAR. Requests for proposals also indicate the CLEAR standards apply to all CEO evaluations. Also, DOL has a "[Department Evaluation Policy Statement](#)" that formalizes the principles that govern all program evaluations in the Department, including methodological rigor, independence, transparency, ethics, and relevance. In addition, CEO publicly communicates the standards and methods expected in all DOL evaluations, and the standards are incorporated into formal procurement statements of work, with scoring for awards based on the standards.
- Additionally, DOL collaborates with other agencies (HHS, ED-IES, NSF, CNCS) on refining cross-agency evidence guidelines and developing technological procedures to link and share reviews across clearinghouses. The [Interagency Evidence Framework](#) conveys the categories of evaluations, the quality review of evaluation methodologies and results, and the use of evaluation findings. The framework is accepted Department-wide.

EVIDENCE / EVALUATION CRITERIA

7. Innovation: Did the agency have staff, policies, and processes in place that encouraged innovation to improve the impact of its programs in FY16?

ACF:

- ACF's [Behavioral Innovations to Advance Self-Sufficiency](#) (BIAS) project is the first major effort to apply a behavioral economics lens to programs that serve poor families in the U.S. Since its inception in 2010, the project has conducted 15 rapid-cycle randomized tests of behavioral innovations in seven states with nearly 100,000 sample members.
- ACF's [Behavioral Interventions for Child Support Services](#) (BICS) demonstration project is applying behavioral insights to child support contexts, developing promising behavioral interventions, and building a culture of regular, rapid-cycle evaluation and critical inquiry within the child support community.
- The Administration's FY17 [budget request](#) (p. 347) proposes to repurpose the Temporary Assistance Contingency Fund for a targeted set of approaches to reducing poverty and promoting family economic security. These include demonstration projects to improve parental employment outcomes concurrently with child and family wellbeing outcomes; subsidized employment programs; and program improvement initiatives, such as monitoring and oversight, technical assistance, and research and evaluation. The proposed demonstration programs would set aside funds for evaluation.
- ACF has actively participated in the [HHS IDEA Lab](#), an entity within HHS launched in 2013, to invest in internal innovation, leverage external innovation, and build collaborative communities to tackle cross-cutting issues of strategic importance. [Current projects](#) include the ACF Administration for Native Americans' Application Toolkit and DataQuest: Making ACF Native Data Visible and Useful, the ACF Office of Family Assistance's Understanding Temporary Assistance for Needy Families Through Data Visualization, and the ACF Office of Head Start's Partnership Alignment Information Response System.
- ACF is participating in the [Performance Partnership Pilots for Disconnected Youth](#) initiative by providing flexibility for grantees to join partnerships at the state level. In addition ACF staff have served as technical and evaluation reviewers for selecting the Round 1 pilot sites, participated in the flexibility review process, and contributed evaluation expertise to planning for local and national evaluations of pilot sites.

CNCS:

- CNCS remains a partner in the [Performance Partnership Pilot](#) (P3) program and has contributed to the national evaluation of this initiative. R&E estimates that one pilot site is leveraging CNCS funding through P3.
- CNCS awarded 10 grants that launched in FY16 as part of a new grant making initiative called [Operation AmeriCorps](#). This initiative was designed to encourage tribal and local leaders to identify a high-priority local challenge that AmeriCorps State and National, AmeriCorps NCCC, and/or AmeriCorps VISTA members can holistically address in a relatively short period of time (no more than 2 years). This grant making initiative is innovative for CNCS as it is the first grant program that requires the blending of resources from different AmeriCorps programs – which usually operate separately – to create a new transformative service solution. In addition to requiring a blended service model, the grant program streamlined the application process and facilitated an internal examination of ways the agency's business processes can be improved. CNCS's R&E Office is conducting a two-year process evaluation of Operation AmeriCorps, which is designed to provide more formal findings on the extent to which the goals of the initiative were achieved.

EVIDENCE / EVALUATION CRITERIA

7. Innovation: Did the agency have staff, policies, and processes in place that encouraged innovation to improve the impact of its programs in FY16?

MCC:

- In September 2014, MCC's [Monitoring and Evaluation](#) division launched the agency's first [Open Data Challenge](#), a call-to-action to Masters and PhD students working in economics, public policy, international development, or other related fields who were interested in exploring how to use [publicly available MCC-financed primary data](#) for policy-relevant analysis. The Challenge was intended to facilitate broader use of MCC's US-taxpayer funded data. Due to the success of the first [Open Data Challenge](#), a second Open Data Challenge was launched in February 2016 in order to encourage innovative ideas and maximize the use of data that MCC finances for its independent evaluations.
- MCC is launching a [gender data competition](#) in Côte d'Ivoire in partnership with the Data2x initiative of the UN Foundation and the World Wide Web Foundation. The competition and larger partnership will spur interest in, creative use of, and new learning from data related to women and girls.
- In 2014, MCC launched an internal "Solutions Lab" that was designed to encourage innovation by engaging staff to come up with creative solutions to some of the biggest challenges MCC faces.
- MCC is conducting an "[Innovation Grant Program](#)" in Zambia in order to encourage local innovation in pro-poor service delivery in the water sector through grants to community-based organizations, civil society and/or private sector entities.
- MCC regularly engages in implementing pilot projects as part of its overall Compact programs. A few examples include: 1) in Morocco, an innovative [pay for results](#) (PFR) mechanism to replicate or expand proven programs that provide integrated support including short-term (one to six months) job readiness skills training, technical training, job matching, follow-up to ensure longevity, and other services and 2) a "[call-for-ideas](#)" in Benin in 2015 that extended an invitation to interested companies and organizations from around the world to submit information regarding potential projects that would expand access to renewable off-grid electrical power in Benin, and 3) a regulatory strengthening project in Sierra Leone that includes funding for a [results-based financing system](#) designed to strengthen the regulator's role, incentivize performance by the utilities, and enhance accountability.

USAID:

- USAID established the U.S. [Global Development Lab](#) (the Lab) in 2014 to increase the application of technology, innovation, and partnerships to extend the Agency's development impact in helping to end extreme poverty. The Lab does this by working closely with colleagues across the Agency and by bringing together a diverse set of partners to discover, test, and scale breakthrough innovations to solve development challenges faster and cheaper and more sustainably. The Lab is the home for the Monitoring, Evaluation, Research and Learning Innovations program ([MERLIN](#)) to source, co-design, implement and test solutions that innovate on traditional approaches to monitoring, evaluation, research and learning.
- USAID has also launched six [grand challenges](#) to engage the public in the search for solutions to development problems.
- The Development Innovation Ventures (DIV) awards grant financing to winners in three distinct stages of financing. Funding ranges from under \$100,000 to \$15 million, and is based on where a project is in its development and to what extent it has previously gathered evidence of success. The [DIV model](#) is designed to find breakthrough solutions, minimize risk and maximize impact through stage financing, rigorously test impacts and cost effectiveness, and scale proven solutions through the public or private sectors.

EVIDENCE / EVALUATION CRITERIA

7. Innovation: Did the agency have staff, policies, and processes in place that encouraged innovation to improve the impact of its programs in FY16?

USED:

- ED's [Investing in Innovation \(i3\)](#) is the Department's signature innovation program for K–12 public education. While the larger i3 grants are focused on validating and scaling evidence-based practices, the smaller i3 grants are designed to encourage innovative approaches to persistent challenges. These "Development" grants are the most prevalent type of i3 grant, comprising 105 out of the 157 i3 grants to date, and 7 of the 13 new i3 grants made in FY15. In order to spur similar types of innovation in higher education, the Department made its second cohort of grantees under its [First in the World \(FITW\)](#) program in FY15. The Department made 18 FITW grants in FY15, the vast majority of which (16 of 18) were in the "Development" category.
- ED is participating in the [Performance Partnership Pilots for Disconnected Youth](#) initiative. These pilots give state, local, and tribal governments an opportunity to test innovative new strategies to improve such outcomes for low-income disconnected youth ages 14 to 24, including youth who are in foster care, homeless, young parents, involved in the justice system, unemployed, or who have dropped out or are at risk of dropping out of school.
- The [White House Social and Behavioral Sciences Team](#) has conducted several behavioral science studies related to ED's work, including looking at the impact of text message reminders for students about key tasks related to college matriculation, such as completing financial aid paperwork, and about notices to student borrowers about income-driven repayment plans.
- ED is currently implementing the [Experimental Sites Initiative](#) to test the effectiveness of statutory and regulatory flexibility for participating institutions disbursing Title IV student aid.
- ED has hired a full-time [Pay-for-Success fellow](#) in FY16. ED has entered into an agreement with the University of Utah's Policy Innovation Lab to support a full-time Pay for Success Fellow at ED. With additional expertise provided by this fellow, ED is deepening its capacity and developing ways to use Pay for Success to expand effective educational programs and promote innovation.
- The IES [Research Grants Program](#) supports the development and iterative testing of new, innovative approaches to improving education outcomes. IES makes research grants with a goal structure. "Goal 2: Development and Innovation" supports the development of new education curricula; instructional approaches; professional development; technology; and practices, programs, and policies that are implemented at the student-, classroom-, school-, district-, state-, or federal-level to improve student education outcomes.

EVIDENCE / EVALUATION CRITERIA

7. Innovation: Did the agency have staff, policies, and processes in place that encouraged innovation to improve the impact of its programs in FY16?

USHUD:

- HUD's Policy Development and Research (PD&R) office is conducting a number of evaluated, random-assignment program demonstrations to test new program models, which can be found in PD&R's [biennial report](#): the [Family Options study](#) of homelessness interventions, Family Self-Sufficiency Demonstration, Pre-Purchase Homeownership Counseling Demonstration, Support and Services at Home (SASH) Demonstration for elderly households, Supportive Services Demonstration for health services in elderly housing, Rent Reform Demonstration, and the Small Area Fair Market Rent Demonstration. The latter demonstrations are in early or middle stages; interim results and long-term follow-up results generally will be reported through HUD USER during the next 2-4 years.
- PD&R also is collaborating with the White House [Social and Behavioral Sciences Team](#) and U.S. Department of Education to link tenant data with records of students and individuals submitting Free Applications for Federal Student Aid, helping increase access of HUD tenants to higher education through low-cost, behaviorally informed experiments about effective outreach methods. While detailed information about these experiments is not available at present, some can be found in HUD's [2015 Annual Report](#) (see p. 62) and will be included in SBST's annual report in July 2016.
- PD&R houses the [Office of International and Philanthropic Innovation](#), and administers five types of [Secretary's Awards](#) to encourage excellence: Public-Philanthropic Partnerships, Opportunity and Empowerment, Healthy Homes, Historic Preservation, and Housing and Community Design. The competitions are judged by juries of professionals, and bring visibility to the nation's most compelling solutions for addressing housing and community development challenges.
- PD&R sponsors an [Innovation in Affordable Housing Competition](#) to engage multidisciplinary teams of graduate students in addressing a specific housing problem developed by an actual public housing agency. The [competition](#) increases the nation's future human capacity to address the affordable housing crisis by exposing future designers, administrators, and policymakers to real-world challenges of a specific legal and community context, with their proposals to be evaluated by an expert jury.
- In FY16, HUD's [National Disaster Resilience Competition](#) is providing funding for resilient housing and infrastructure projects to states and communities that suffered major disasters. Collaborative teams were assisted in extensively researching and developing their proposals by nine Resilience Academies developed by the Rockefeller Foundation in partnership with HUD. The in-depth, juried process is ensuring that the \$1 billion of resources available for these communities in FY16 will result in more resilient housing and infrastructure and bridge the gap between social and physical vulnerabilities.

USDOL:

- DOL is participating in the [Performance Partnership Pilots \(P3\)](#) for innovative service delivery for disconnected youth which includes not only waivers and blending and braiding of federal funds, but gives bonus points in application reviews for proposing "high tier" evaluations. DOL is the lead agency for the evaluation of P3. DOL's CEO and ETA prepared an evaluation technical assistance [webinar](#) for P3 grantees in 2014 and will be repeated for the next round of grantees in 2016. Beginning in FY16, the national P3 evaluation contractor is also providing evaluation TA to grantees for methodological design issues and data and management information systems.
- DOL has initiated six behavioral insights tests (three in unemployment insurance, two in OSHA, and one in EBSA for pension contributions), and two behavioral insights testing different messaging to encourage voluntary compliance embedded into a larger experimental evaluations (in OSHA and Unemployment Insurance). The behavioral tests are being conducted in FY16. Initial findings will be released in April 2016 and will be posted on the CEO [website](#).

EVIDENCE / EVALUATION CRITERIA

8. Use of Evidence in 5 Largest Competitive

Grant Programs: Did the agency use evidence of effectiveness when allocating funds from its 5 largest competitive grant programs in FY16?

ACF:

- In FY16 the 5 largest competitive grant programs are: 1) Head Start (\$9,168,095,000); 2) Unaccompanied Children Services (\$948,000,000); 3) Early Head Start-Child Care Partnerships (\$915,799,422); 4) Transitional and Medical Services (\$490,000,000); and 5) Preschool Development Grants (\$250,000,000).
- ACF's [template](#) (see p. 14 in Attachment C) for grant announcements includes two options, requiring grantees to either 1) collect performance management data that contributes to continuous quality improvement and is tied to the project's logic model, or 2) conduct a rigorous evaluation for which applicants must propose an appropriate design specifying research questions, measurement and analysis.
- In FY12, ACF established the [Head Start Designation Renewal System](#) requiring Head Start (\$9.2 billion in FY16) grantees to compete for grants moving forward if they failed to meet criteria related to service quality, licensing and operations, and fiscal and internal control.
- ACF's [Personal Responsibility Education Program](#) (\$75 million in FY16) includes three individual discretionary grant programs that support evidence-based competitive grants that teach youth about abstinence and contraception to prevent pregnancy and sexually transmitted infections.
- To receive funds through ACF's [Community Based Child Abuse Prevention](#) (CBCAP) program, states must "demonstrate an emphasis on promoting the increased use and high quality implementation of evidence-based and evidence-informed programs and practices." CBCAP defines evidence-based and evidence-informed programs and practices along a continuum with four categories: Emerging and Evidence-Informed; Promising; Supported; and Well Supported. Programs determined to fall within specific program parameters will be considered to be "evidence informed" or "evidence-based" practices (EBP), as opposed to programs that have not been evaluated using any set criteria. ACF monitors progress on the percentage of program funds (most recently 89.4% in FY14) directed towards evidence-based and evidence-informed practices.

CNCS:

- In CNCS is operating three competitive grant programs in FY16: 1) AmeriCorps State and National program (excluding State formula grant funds) (\$386 million in FY16); 2) Senior Corps RSVP program (\$49 million in FY16); and 3) the Social Innovation Fund (SIF) (\$50 million in FY16).
- SIF provides competitive grants to non-profit grant-making organizations to help them grow promising, evidence-based solutions that address pressing economic opportunity, healthy futures, and youth development issues in low- income communities. The FY14-16 Omnibus Appropriations Acts have allowed CNCS to invest up to 20% of SIF funds each year in Pay for Success initiatives. There are 2 Pay for Success competitions planned for FY16, which will invest both the FY15 and 16 appropriations (approximately \$11.6 million at minimum).
- CNCS's AmeriCorps State and National Grants Program (excluding State formula grant funds), [application](#) (see pp. 10-14) allocated up to 27 points out of 100 to organizations that submit applications supported by performance and evaluation data in FY16. Specifically, up to 15 points can be assigned to applications with theories of change supported by relevant research literature, program performance data, or program evaluation data; and up to 12 points (a 4 point increase from FY15) can be assigned for an applicant's incoming level of evidence with the highest number of points awarded to strong levels of evidence. These categories of evidence are modeled closely on the levels of evidence defined in the Social Innovation Fund.
- In FY16, Senior Corps RSVP grantees [seeking funding](#) (see p. 1) through the administrative renewal process are encouraged to fulfill the National Performance Measures requirement by committing a certain number of volunteers to serve in an evidence-based health education program. A total of \$500,000 (just above 1% of program funds) is allocated to support organizations in implementing evidence-based interventions or to evaluate programs.

EVIDENCE / EVALUATION CRITERIA

8. Use of Evidence in 5 Largest Competitive Grant Programs: Did the agency use evidence of effectiveness when allocating funds from its 5 largest competitive grant programs in FY16?

MCC:

- MCC awards all of its agency funds through two competitive grant programs: [Compact and Threshold programs](#) (whose budgets for [FY16](#) were \$667 and \$30 million respectively). Both require demonstrable, objective evidence to support the likelihood of success in order to be awarded funds. For country partner selection, MCC uses twenty different indicators within the categories of economic freedom, investing in people, and ruling justly to determine country eligibility for program assistance. These indicators (see MCC's [FY2016 Guide to the Indicators](#)) are collected by independent third parties. When considering granting a [second compact](#), MCC considers 1) the degree to which there is evidence of strong political will and management capacity, 2) the degree to which the country has exhibited commitment and capacity to achieve program results, and 3) the degree to which the country has implemented the compact in accordance with MCC's core policies and standards.
- Following country selection, MCC conducts a [constraints analysis](#) (CA) to identify the most binding constraints to private investment and entrepreneurship that hold back economic growth. The results of this analysis enable the country, in partnership with MCC, to select compact or threshold activities most likely to contribute to sustainable poverty-reducing growth. Due diligence, including feasibility studies where applicable, are conducted for each potential investment. MCC also performs [Cost-Benefit Analysis](#) to assess the potential impact of each project, and estimates an Economic Rate of Return. MCC projects generally have an ERR above 10% at project inception, and MCC recalculates ERRs at compact closeout in order to test original assumptions and assess the cost effectiveness of MCC programs. In connection with the ERR, MCC conducts a [Beneficiary Analysis](#), which seeks to describe precisely which segments of society will realize the project benefits. It is most commonly used to assess the impact of projects on the poor, but it has broader applicability that allows for the estimation of impact on populations of particular interest, such as women, the aged, children, and regional or ethnic sub-populations. In line with MCC's M&E policy, MCC projects are required to submit quarterly Indicator Tracking Tables showing progress toward projected targets. MCC also requires independent evaluations of every project to assess progress in achieving outputs and outcomes throughout the lifetime of the project and beyond..

EVIDENCE / EVALUATION CRITERIA

8. Use of Evidence in 5 Largest Competitive Grant Programs: Did the agency use evidence of effectiveness when allocating funds from its 5 largest competitive grant programs in FY16?

USAID:

- USAID is committed to using evidence of effectiveness in all of its competitive contracts, cooperative agreements and grants, which comprise the majority of the Agency’s work. USAID has rebuilt its [planning, monitoring, and evaluation framework](#) to produce and use evidence through the introduction of a new [Program Cycle](#), which systematizes use of evidence across all decision-making regarding grants and all of USAID’s work. The Program Cycle is USAID’s particular framing and terminology to describe a common set of processes intended to achieve more effective development interventions and maximize impacts. The Program Cycle acknowledges that development is not static and is rarely linear, and therefore stresses the need to assess and reassess through regular monitoring, evaluation, and learning. Thus the different components of the Program Cycle mutually reinforce each other by having learning and adapting integrated throughout. The Program Cycle encourages planning and project management innovations to increase the cost-effectiveness and lasting impact of development cooperation.
- In 2013, USAID reformed its policy for awarding new contracts to elevate past performance to comprise 20 to 30 percent of the non-cost evaluation criteria. For assistance, USAID does a “risk assessment” to review an organization’s ability to meet the goals and objectives outlined by the Agency. This can be found in [ADS 303](#), section 303.3.9. Contractor performance is guided by USAID operational policy [ADS 302](#), section 302.3.8.7. As required in FAR Subpart 42.15, USAID must evaluate contractor performance using the Contractor Performance Assessment Reporting System (CPARS). Information in CPARS, while not available to the public, is available for Contracting Officers across the Government to use in making determinations of future awards.
- USAID has also instituted a policy called the Acquisition and Assistance Review and Approval Document (AARAD) process where all contracts, grants, and cooperative agreements over \$75 million are reviewed by the Administrator prior to being awarded and all awards over \$25 million are reviewed by the relevant Assistant Administrators. Included in the AARAD review are several key factors that include: Policy Relevant, Commitment to Sustainable Results, Feasibility, and Value for Money. This policy ensures that results, evidence, and long-term strategies are incorporated into all of USAID’s major programs. In addition, it ensures senior level accountability on USAID’s biggest programs. This policy is outlined in [ADS 300](#). USAID [guidance](#) for competitive grants is also available online.
- The [Development Innovation Ventures](#) program (\$22.4 million in FY16) provides funding for proof of concept through rigorous evaluation of innovative solutions, and scale-up funding when a solution is proven to work. [DIV’s approach](#) is unique in three ways:
 1. DIV recognizes that good ideas can come from anywhere, so they welcome a [wide range of potential partners](#) to propose their concepts for high-impact development solutions.
 2. Borrowing from the experience of venture capital, DIV takes advantage of a staged financing model. They pilot promising new ideas with small amounts of money, and we scale only those solutions that rigorously demonstrate their impact.
 3. DIV emphasizes a high standard of evidence, including the use of impact evaluations and randomized control trials whenever possible.

EVIDENCE / EVALUATION CRITERIA

8. Use of Evidence in 5 Largest Competitive Grant Programs: Did the agency use evidence of effectiveness when allocating funds from its 5 largest competitive grant programs in FY16?

USED:

- ED's five largest competitive grant programs in FY16 include: 1) TRIO (\$900 million); 2) GEAR UP (\$323 million); 3) Teacher Incentive Fund (\$230 million); 4) Charter Schools Grants (\$333 million); and 5) Preschool Development Grants (\$250 million).
- The Evidence Planning Group (EPG) advises program offices on ways to incorporate evidence in grant programs, including use of evidence as an entry requirement or priority to encourage the use of practices where there is evidence of effectiveness, and/or an exit requirement or priority to build new evidence. For the past several years, ED has reported publicly on [Performance.gov](#) on its [Agency Priority Goal](#) (APG) focused on directing an increasing percentage of funds available for new competitive awards towards projects that are supported by evidence. In FY15, ED spent 29% of its funding available for new discretionary awards on projects that are supported by promising, moderate, or strong evidence, based on [EDGAR](#) evidence levels, surpassing both the FY15 and FY16 targets for that APG.
- While not all of ED's FY16 decisions have been finalized yet, ED has announced the following FY16 competitions, which include the use of evidence beyond a logic model: 1) Alaska Native and Native Hawaiian Serving Institutions, 2) Asian American and Native American Pacific Islander-Serving Institutions Program, 3) College Assistance Migrant Program, 4) Educational Technology, Media, and Materials for Individuals with Disabilities—Stepping-up Technology Implementation, 5) High School Equivalency Program, 6) Hispanic-Serving Institutions - Science, Technology, Engineering, or Mathematics, 7) National Professional Development, 8) Native American-Serving Nontribal Institutions Program, 9) Technical Assistance and Dissemination To Improve Services and Results for Children With Disabilities, and 10) TRIO Talent Search.
- The [Investing in Innovation \(i3\) program](#) (\$120 million in FY16) provides competitive grants to local school districts and non-profit organizations that have demonstrated positive impacts to innovate, expand, and scale evidence-based activities to improve student achievement, although details for the FY16 competition have not been announced. ESSA authorizes an Education Innovation and Research (EIR) Grants program.
- Additionally, ESSA requires that ED give priority to applicants demonstrating strong, moderate, or promising levels of evidence within the following seven competitive grant programs: Literacy Education for All, Results for the Nation; Supporting Effective Educator Development; School Leader Recruitment and Support; Statewide Family Engagement Centers; Promise Neighborhoods; Full-Service Community Schools; and Supporting High-Ability Learners and Learning.
- ESSA authorizes the Supporting Effective Educator Development program that awards grants to applicants with a demonstrated record of improving student outcomes while giving priority to applicants demonstrating strong, moderate, or promising evidence of effectiveness (as described above). And ESSA authorizes the Replication and Expansion of High-Quality Charter Schools program that awards grants to applicants based on their demonstrated success in improving student outcomes.
- ED's FY17 budget, which for P-12 programs is based on ESSA, prioritizes funding evidence-based activities. For example, the budget includes \$180 million for the EIR program, an increase of \$60 million over the FY16 enacted level for its predecessor, the i3 program. ED also proposes building new evidence to increase the effectiveness of the Magnet Schools Assistance Program. Requests like the \$100 million in FITW program, \$30 million HBCU/MSI Innovation for Completion Fund competitive grant program, and the use of up to \$20 million to develop a TRIO Demonstration Initiative, in consultation with the TRIO community, demonstrate ED's commitment to building and using evidence to improve college access and completion.

EVIDENCE / EVALUATION CRITERIA

8. Use of Evidence in 5 Largest Competitive Grant Programs: Did the agency use evidence of effectiveness when allocating funds from its 5 largest competitive grant programs in FY16?

USHUD:

- In FY16 HUD's major competitive grant programs are: 1) [Homeless Assistance](#) (\$1.9 billion); 2) [Disaster Assistance/National Disaster Resilience Competition](#) (\$300 million); 3) [Choice Neighborhoods Grants program](#) (\$125 million); 4) [Service Coordinators program](#) (\$77 million); and 5) [Family Self-Sufficiency Program](#) Coordinators (\$73 million).
- The National Disaster Resilience Competition used evidence about disaster resilience, including benefit/cost analysis, to ensure that disaster funding improves communities' ability to withstand and recover more quickly from future disasters, hazards, and shocks rather than simply recreating the same vulnerabilities.
- Decisions regarding the design, funding, and implementation of all HUD competitive grant programs are evidence-based, as specified in funding criteria in HUD's FY16 [Notice of Funding Availability](#) (NOFA). The "Achieving Results and Program Evaluation" factor (see p.13), provides funding priority for applicants that demonstrate effective use of evidence in identifying or selecting the proposed practices, strategies, or programs proposed in the application, and requires all grantees to cooperate in HUD-funded research and evaluation studies (see p. 14). Another factor, "Past Performance," provides: "In evaluating applications for funding HUD will take into account an applicant's past performance in managing funds, including, but not limited to.... meeting performance targets as established in Logic Models or other performance evaluation tools approved as part of the grant agreement...." (see p. 14). The "Achieving Results and Program Evaluation" factor and "Past Performance" factor are two of five factors considered that total 100 points. The maximum achievable score, with priority points and bonus points, is 106.

USDOL:

- In FY16, the five largest competitive grant programs awarded were: 1) American Apprenticeship Initiative (\$175 million), 2) Face Forward Grants Program (\$59 million), 3) Disability Employment Initiative (\$60 million), 4) Homeless Veterans Reintegration Program (\$35 million), and 5) the Workforce Innovation Fund/Pay for Success 2016 (\$35 million in FY16). All have national evaluations designed by CEO and the relevant agencies, and two also require grantees to use a portion of their fund for high-quality evaluations on which incentive and priority points were received in the application funding competitive selection process.
- DOL includes rigorous evaluation requirements in all competitive grant programs, involving either: 1) full participation in a national evaluation as a condition of grant receipt; 2) an independent third-party local or grantee evaluation with priority incentives for rigorous designs (e.g., tiered funding, scoring priorities, bonus scoring for evidence-based interventions or multi-site rigorous tests), or 3) full participation in a national evaluation as well as rigorous grantee (or local) evaluations. The \$10 million [Linking to Employment Assistance Pre-Release Grant](#) program to improve employment for formerly incarcerated individuals serves as an example of the requirement to participate in a national evaluation as a condition of the grant.
- The [Trade Adjustment Assistance Community College and Career Training Grant Program](#) (TAACCT) program (\$2 billion in FY12-14 available through FY 2017; including \$410 million in FY 2016) provides grants to community colleges and other higher education institutions to develop and expand evidence-based education and training for dislocated workers changing careers. Up to 10% of each grant can be spent on evaluation. DOL has awarded \$11 million for technical assistance and a national evaluation of the program.
- The [Workforce Innovation Fund](#) grants (\$232 million total, including \$35 million awarded in FY 2016) and Pay for Success (\$35 million total) are awarded to rigorously test innovation training and employment strategies, with rigorous evaluations incorporated into the programming. PFS is a social investment pilot with payment based on rigorous randomized control trial impacts.

EVIDENCE / EVALUATION CRITERIA

9. Use of Evidence in 5 Largest Non-Competitive Grant Programs: Did the agency use evidence of effectiveness when allocating funds from its 5 largest non-competitive grant programs in FY16?

(Note: Meeting this criteria requires both Agency and Congressional action.)

ACF:

- In FY16, ACF's 5 largest non-competitive grant programs are: 1) Temporary Assistance for Needy Families (\$17,345,407,000); 2) Child Care and Development Fund (Block Grant and Entitlement to States combined) (\$5,678,000,000); 3) Foster Care (\$4,799,573,280); 4) Child Support Enforcement Payments to States (\$4,303,998,000); and 5) Low Income Home Energy Assistance (\$3,390,304,000).
- ACF's [Foster Care](#) program (\$4.8 billion in FY16) has approved over 30 jurisdictions to develop and implement child welfare waiver demonstration projects to improve outcomes for children in foster care or at risk for entry or re-entry into foster care. Through these demonstrations, ACF waives provisions of law to allow flexible use of funding normally limited to foster care for other child welfare services. Many participating jurisdictions are implementing evidence-based or evidence-informed interventions and all demonstration projects are required to have a rigorous evaluation conducted by a third-party evaluator. Although ACF does not currently have statutory authority to grant new waivers, current projects are expected to continue through September 30, 2019. [General information](#) on this program, including a [fact sheet](#) and summary of relevant [legislation/policy](#), is available at the online [Children's Bureau](#) portal.

CNCS:

- CNCS operates one formula grant program, the AmeriCorps State formula grants program (\$130 million in FY16). CNCS also operates four direct grant programs in FY16: 1) National Civilian Community Corps (NCCC) (\$30 million in FY16), 2) VISTA (\$92 million in FY16), 3) Senior Corps Foster Grandparents (\$108 million in FY16), and 4) Senior Corps Senior Companion Program (\$46 million in FY16).
- In FY16, for the first time, the Senior Corps Foster Grandparents and Senior Companion programs embedded evidence into their grant renewal processes by offering supplemental funding to grantees interested in deploying volunteers to serve in [evidence-based programs](#) (see pp. 2-4) and providing evaluation data on implementation fidelity, including outcomes. A total of \$400,000.00 is allocated for the Foster Grandparents program in FY16, or .4% of program funds. A total of \$300,000.00 is allocated for the Senior Companion program in FY16, or .65% of program funds.
- VISTA is currently developing a theory of change that will make explicit the link between the work that the volunteers perform, the design of a sponsor's project to address community needs, and the evidence to support this activity. This effort will impact several management aspects including project approval, volunteer assignment descriptions, member activity, data collection, and the role of evidence in the design and implementation of projects.

MCC:

- MCC does not administer non-competitive grant programs.

USAID:

- USAID does not administer non-competitive grant programs.
- USAID does contribute funding to multilateral institutions known as Public International Organizations (PIOs), which are listed [here](#), and include the World Bank, UN, and multi-donor funds such as the Global Fund. A Public International Organization (PIO) is an international organization composed principally of countries. In these specific cases, USAID funds are part of overall US Government funding for these partner institutions. These funds become subject to the monitoring and evaluation requirements of the organization that receives them. For example, the [Global Fund](#) has a performance-based funding system, which bases funding decisions on a transparent assessment of results against time-bound targets. USAID's [ADS chapter 308](#) provides more information on how PIOs are defined and includes guidance related to due diligence required prior to awarding grants to PIOs.

EVIDENCE / EVALUATION CRITERIA

9. Use of Evidence in 5 Largest Non-Competitive Grant Programs: Did the agency use evidence of effectiveness when allocating funds from its 5 largest non-competitive grant programs in FY16?

(Note: Meeting this criteria requires both Agency and Congressional action.)

USHUD:

- HUD's [budget](#) contains 3 large formula grant programs for public housing authorities (PHAs): 1) the Public Housing Operating Fund (\$4.5 billion in FY16), 2) the Public Housing Capital Grants (\$1.8 billion in FY16), and 3) Housing Choice Voucher (HCV) Administrative Fees (\$1.7 billion in FY16). Another 3 formula grant programs serve cities or tribes: 1) Community Development Block Grant Entitlement/Non-Entitlement (\$3.0 billion in FY16), 2) HOME Investment Partnerships (\$0.9 billion in FY16), and 3) Native American Housing Block Grants (\$0.6 billion in FY16).
- Although the funding formulas are prescribed in statute, evaluation-based evidence is central to each program. HUD is using evidence from a 2015 Administrative Fee study of the costs that high-performing PHAs incur in administering a HCV program to propose a new FY17 approach for funding Administrative Fees while strengthening PHA incentives to improve HCV outcomes by providing tenant mobility counseling.
- HUD is also conducting a [Rent Reform](#) demonstration and a [Moving To Work](#) (MTW) demonstration to test efficiencies of changing rent rules.
- HUD also is conducting an extensive [assessment](#) of Native American, Alaska Native, and Native Hawaiian housing needs to strengthen the evidence base for the formula programs.

USDOL:

- In FY16, the 5 largest non-competitive grant programs at DOL are in the Employment and Training Administration, all of which allocate funding, by statute, and all include performance metrics (e.g., unemployment insurance payment integrity, WIOA common measures) tracked quarterly: 1) the Unemployment Insurance State grants (\$2.6 billion in FY 2016); 2) the Employment Security program state grants (\$680 million in FY 2016); and 3) three authorized programs under the Workforce Innovation and Opportunity Act (WIOA). The 3 WIOA-authorized grants are: 1) Youth Workforce Investment program (\$873 million in FY 2016), 2) Adult Employment and Training program (\$816 million in FY 2016), and 3) Dislocated Workers Employment and Training program (\$1.2 billion in FY 2016).
- WIOA includes evidence and performance provisions beginning in Program Year 2016 which: (1) increase the amount of WIOA funds states can set aside and distribute directly from 5-10% to 15% and authorize them to invest these funds in Pay for Performance initiatives; (2) authorize states to invest their own workforce development funds, as well as non-federal resources, in Pay for Performance initiatives; (3) authorize local workforce investment boards to invest up to 10% of their WIOA funds in Pay for Performance initiatives; and (4) authorize States and local workforce investment boards to award Pay for Performance contracts to intermediaries, community based organizations, and community colleges.

EVIDENCE / EVALUATION CRITERIA

10. Repurpose for Results: In FY16, did the agency shift funds away from any practice, policy, or program which consistently failed to achieve desired outcomes?

(Note: Meeting this criteria requires both Agency and Congressional action.)

ACE:

- In FY12, ACF established the [Head Start Designation Renewal System](#) requiring Head Start (\$9.2 billion in FY16) grantees to compete for grants moving forward if they failed to meet criteria related to service quality, licensing and operations, and fiscal and internal controls. The 2007 Head Start Reauthorization Act made all Head Start grants renewable, five-year grants. At the end of each five-year term, grantees that are running high-quality programs will have their grants renewed. But grantees that fall short of standards are now required to compete to renew grants. Grantees whose ratings on any of the three domains of the Classroom Assessment Scoring System, an assessment of adult:child interactions linked to improved outcomes, fall below a certain threshold, or in the lowest 10 percent of grantees, must also compete.
- ACF's FY17 [budget request](#) (p. 418) proposes to eliminate funding for Abstinence Education grants because the program is not focused on funding evidence-based models.

CNCS:

- In FY13-FY14, Mile High United Way, a grantee of the Social Innovation Fund (SIF), ended funding relationships with 3 of its sub-grantees who were not able to conduct rigorous evaluations of their activities. In FY15, United Way for Southeastern Michigan, also a SIF grantee, ended its funding relationship with one of its sub-grantees for the same reason. These actions are consistent with the [SIF National Assessment](#) findings, which recognize the role SIF has played in fostering evidence-based grant making among its grantees.

MCC:

- MCC has established a [Policy on Suspension and Termination](#) that describes the process and procedures for suspension and termination of MCC assistance in cases in which partner countries are not living up to their commitments. MCC has suspended or [terminated](#) a compact partnership, in part or in full, seven times out of 33 compacts approved to date, and has suspended partner country eligibility to develop a compact an additional four times (most recently with the suspension of Tanzania in March 2016). In 2012 MCC suspended [Malawi's Compact](#) due to a pattern of actions by the Government of Malawi that was inconsistent with the democratic governance evidence criteria that MCC uses for selection. However, the Government of Malawi took a number of decisive steps to improve the human rights environment and to ensure that laws and institutions support democratic rights and processes. These steps and the resumption of sound economic policy led to the reinstatement of Malawi's Compact in 2012.
- MCC also consistently monitors the progress of Compact programs, and makes changes as necessary. For example, an activity in the Philippines, the Electronic Tax Information System (eTIS), an activity under the Revenue Administration Reform Project, was [reduced in scope](#) in FY15 due to time and completion risks. This proactive approach allowed MCC to judiciously reallocate funds to finance additional subprojects under the Kalahi-CIDSS Community-Driven Development Project (K-C) and further maximize the project's benefits.

EVIDENCE / EVALUATION CRITERIA

10. Repurpose for Results: In FY16, did the Agency shift funds away from any practice, policy, or program which consistently failed to achieve desired outcomes?

(Note: Meeting this criteria requires both Agency and Congressional action.)

USAID:

- USAID uses rigorous evaluations to maximize its investments. A [recent independent study](#) found that 71 percent of USAID evaluations have been used to modify and/or design USAID projects. Below are a few examples where USAID has shifted funds and/or programming decisions based on performance:
- **Mozambique:** Many donors working in the education sector in Mozambique were using traditional reading programs to improve early grade literacy. USAID recently designed an impact evaluation to test whether reading interventions alone or reading interventions paired with school management support led to improved reading outcomes. Findings from a mid-term impact evaluation found that pairing reading instruction interventions with school management support improved reading outcomes more than reading instruction alone, and was more cost effective. Based on these findings, USAID Mozambique changed the way it worked in Mozambique, and the findings prompted the Government of Mozambique to request that this approach be scaled from 120 schools to 1,060 new schools. More information can be found in the [recently published report on USAID evaluation practice](#).
- **Armenia:** A 2013 mid-term [evaluation](#) of USAID/Armenia's flagship health program revealed a number of significant design and implementation flaws, which prompted the Mission to terminate the program early and saved USG resources. Since then, USAID/Armenia has redesigned its health portfolio to focus on areas where it can make difference and leave a positive legacy, as it phases out from the sector.
- **Latin America and Caribbean Bureau:** USAID's Latin America and Caribbean (LAC) Bureau no longer funds expensive out-of-country scholarship programs such as the Scholarship for Education and Economic Development (SEED) and other precursor programs. A 2013 [evaluation](#) of the Latin America and Caribbean region's Higher Education Scholarships Program looked at the cost-effectiveness of providing students with scholarships to study at US institutions and determined that USAID could provide improved training opportunities for many more poor youth by focusing resources on improving the quality of LAC regional or in-country training institutions. This finding informed a redesign of the program and the issuing of a new Request for Applications (RFA).
- **Indonesia:** In 2013, a USAID Indonesia changed the geographic targeting of a forestry program based on a USAID-commissioned evaluation that found that the program was spread out among too many geographic locations and could be more effective by focusing on fewer locations. This example can be found in the recently published independent [study on evaluation use at USAID](#).
- In 2011, a USAID-commissioned evaluation of a USAID/Afghanistan road rehabilitation program found that cooperative agreements and grants are not as effective implementing mechanisms as contracts in terms of the levels of implementing partner accountability to USAID, particularly in regards to infrastructure activities. In part as a result of this evaluation's findings, in 2013 USAID released a new operating policy, entitled "[USAID Implementation of Construction Activities](#)," that mandates the use of contracts rather than grant or cooperative agreement mechanisms for projects that involve construction.

USED:

- Since 2010, ED has worked with Congress to eliminate 50 programs, saving more than \$1.2 billion, including programs like [Even Start](#) (see pp. A-72 to A-73) (-\$66.5 million in FY11) and [Mentoring Grants](#) (see p. G-31) (-\$47.3 million in FY10), which the Department recommended eliminating out of concern based on evidence.
- ED also tries to shift program funds to support more effective practices by prioritizing the use of entry evidence. For ED's grant competitions where there is evaluative data about current or past grantees, or where new evidence has emerged independent of grantee activities, ED typically reviews such data to shape the grant competition design of future projects. For example, an [impact evaluation](#) of the [Teacher Incentive Fund](#) (TIF) will inform ED's FY16 competition design for TIF, including focusing applicants' attention on practices more likely to be effective.
- Additionally, ED uses evidence in competitive programs to encourage the field to shift away from less effective practices and toward more effective practices. For example, ESSA's Education Innovation and Research (EIR) program - the successor to i3 - supports the creation, development, implementation, replication, and scaling up of evidence-based, field-initiated innovations designed to improve student achievement and attainment for high-need students.

EVIDENCE / EVALUATION CRITERIA

10. Repurpose for Results: In FY16, did the agency shift funds away from any practice, policy, or program which consistently failed to achieve desired outcomes?

(Note: Meeting this criteria requires both Agency and Congressional action.)

USHUD:

- HUD's FY17 [budget request](#) includes a new formula for funding [Housing Choice Voucher Administrative Fees](#) that shifts funding away from inappropriately compensated public housing agencies and increases overall funding according to evidence about actual costs of maintaining a high-performing voucher program. (See [here](#) for more info.)
- The Administration's FY17 request recommends shifting support from homeless interventions shown to have limited effectiveness toward housing vouchers that were proven effective in the [Family Options study](#).

USDOL:

- DOL's evidence-based strategy is focused on program performance improvement and expansion of strategies and programs on which there is evidence of positive impact from rigorous evaluations. The department takes all action possible to improve performance before considering funding reductions or program termination. However, DOL does use program performance measures to make decisions about future funding. For example there is currently a proposal to close a Job Corps Center because of its chronic low performance. Closure of this center will allow DOL to shift limited program dollars to centers that will better serve students by providing the training and credentials they need to achieve positive employment and educational outcomes. In a [Federal Register notice](#) published in March 2016, DOL requested public comments on this proposal. Additionally, all discretionary grant performance is closely monitored and has been used to take corrective action and make decisions about continued funding.

About the Results for America Federal Invest in What Works Index

Results for America's Federal Invest in What Works Index (2016) highlights the extent to which the Administration for Children and Families (within HHS); Corporation for National and Community Service; Millennium Challenge Corporation; U.S. Agency for International Development; U.S. Department of Education; U.S. Department of Housing and Urban Development and U.S. Department of Labor are currently building the infrastructure necessary to be able to use data, evidence and evaluation in budget, policy, and management decisions. It is important to note that:

- Results for America developed the criteria and scoring structure in the attached index in close consultation with more than 75 current and former Federal government officials and key stakeholders from all across the country.
- The purpose of the attached index is to educate members of the general public as well as public, private, and non-profit sector leaders on how federal departments and agencies are currently using data, evidence and evaluation to invest taxpayer dollars in what works.
- Results for America gave the federal departments and agencies included in the attached index multiple opportunities to review and comment on the content and presentation of the information included in it. We greatly appreciate their willingness to help us develop this document and their continued commitment to making the federal government as effective and efficient as possible. Since we recognize that it is very difficult to distill complex practices, policies, and programs into a single cross-agency scorecard, we exercised our best judgment and relied on the deep expertise of leaders both within and outside of the federal government during the development of the attached index.
- Results for America released four previous versions of this Invest in What Works Index in; [June 2013](#), [September 2013](#), [May 2014](#) and [March 2015](#).

Scoring

The attached index assesses seven federal departments and agencies against 10 data, evidence and evaluation criteria. Each criteria was equally weighted and scored on a scale of 0-10 resulting in a total possible score of 100 points. Federal departments and agencies were given 1-3 points if they have demonstrated an intent to meet the stated criteria; 4-5 points if they have demonstrated some initial internal progress toward meeting the criteria; 6-7 points if they have made some initial public progress toward meeting the criteria; 8-9 points if they have made some meaningful public progress toward meeting the criteria; and 10 points if they have fully and successfully met the criteria. These scores are based on the information and links provided by these seven departments and agencies.

About Results for America

Results for America is improving outcomes for young people, their families, and communities by shifting public resources toward evidence-based, results-driven solutions. RFA is working to achieve this goal by building a strong bipartisan "Invest in What Works" coalition; developing and advancing the next generation of evidence-based, results-driven practices, policies, and programs; and supporting leaders at all levels of government to invest in what works.

In November, 2014, Results for America published [Moneyball for Government](#), the national bestselling book that brings together a group of bipartisan leaders and makes the case for government at all levels to inform public policy and funding decisions by using the best possible data, evidence and evaluation about what works. In January, 2016, RFA published the second edition of Moneyball for Government featuring a new bipartisan chapter about the importance of using data and evidence to drive U.S. foreign assistance. For more information about Results for America, visit www.results4america.org.



MONEYBALL FOR GOVERNMENT PRINCIPLES

Government at all levels should help improve outcomes for young people, their families, and communities by:

- 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.

MONEYBALL FOR GOVERNMENT ALL STARS

The following 126 local, state, and national leaders from across the political spectrum support the Moneyball for Government Principles and have agreed to be publicly identified as Moneyball for Government All-Stars:

Founding All-Stars: Michael Bloomberg (Former Mayor, New York City); Peter Orszag (Former Director, Office of Management and Budget under President Obama); Jim Nussle (Former U.S. Rep., R-IA; Former U.S. House Budget Committee Chairman; and Former Director, White House Office of Management and Budget under President G.W. Bush); Melody Barnes (Former Director, White House Domestic Policy Council under President Obama); and John Bridgeland (Former Director, White House Domestic Policy Council under President G.W. Bush);

Federal All-Stars: U.S. Senator Kelly Ayotte (R-NH); U.S. Senator Michael Bennet (D-CO); U.S. Senator Orrin Hatch (R-UT); U.S. Senator Jeanne Shaheen (D-NH); U.S. Senator Mark Warner (D-VA); Former U.S. Senator Mary Landrieu (D-LA); Speaker of the U.S. House of Representatives Paul Ryan (R-WI); U.S. Representative Todd Young (R-IN); U.S. Representative John Delaney (D-MD); Gene Sperling (Former Director, White House National Economic Council under Presidents Obama and Clinton); Austan Goolsbee (Former Chairman, White House Council of Economic Advisors under President Obama); Richard Riley (Former U.S. Secretary of Education under President Clinton); Robert E. Rubin (Former Secretary of the U.S. Treasury Department under President Clinton); Henry Paulson (Former Secretary of the U.S. Treasury Department under President G. W. Bush); Margaret Spellings (Former U.S. Secretary of Education under President G.W. Bush); Glenn Hubbard (Former Chairman, White House Council of Economic Advisers under President G.W. Bush); Laura D. Tyson (Former Chair, President's Council of Economic Advisers, and former White House National Economic Council Director); and Roger Porter (Former Assistant to the President for Economic

and Domestic Policy under President George H.W. Bush; former Director, White House Office of Policy Development under President Reagan; and former Executive Secretary of the President's Economic Policy Board under President Ford);

State All-Star: VA Governor Terry McAuliffe;

Local All-Stars: Richard J. Berry (Mayor of Albuquerque); Kasim Reed (Mayor of Atlanta); Stephanie Rawlings-Blake (Mayor of Baltimore); Martin Walsh (Mayor of Boston); Michael Hancock (Mayor of Denver); Karen Freeman-Wilson (Mayor of Gary); Stephen Goldsmith (Former Mayor of Indianapolis); Sly James (Mayor of Kansas City); Eric Garcetti (Mayor of Los Angeles); Greg Fischer (Mayor of Louisville); Mitch Landrieu (Mayor of New Orleans); Bill de Blasio (Mayor of New York City); Michael Nutter (Former Mayor of Philadelphia); Angel Taveras (Former Mayor of Providence); Ben McAdams (Mayor of Salt Lake County); Julian Castro (Former Mayor of San Antonio; current Secretary, U.S. Department of Housing and Urban Development); and Ed Murray (Mayor of Seattle);

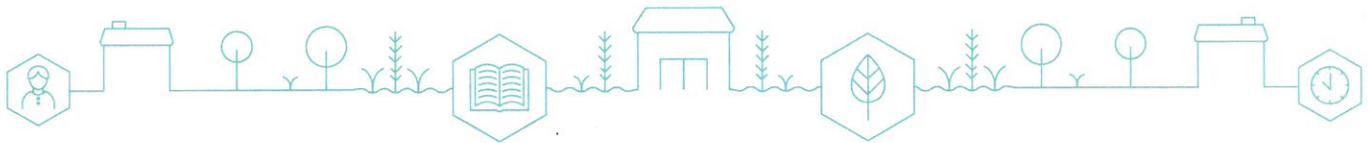
Non-Profit All-Stars: 85 non-profit CEOs, presidents, and executive directors also support our Moneyball for Government Principles.

What Works Cities

What Works Cities is a national initiative working with cities across the country to enhance their use of data and evidence to engage residents, make government more effective and improve lives.

Launched in April 2015, What Works Cities is one of the largest-ever philanthropic efforts to improve local governments' data and evidence practices and was named by Forbes as "one of the biggest philanthropic bets on social change from 2015."

Through world-class partners, the initiative provides technical assistance to cities with populations between 100,000 and 1,000,000 that are committed and excited to improve the way they use data in governance. What Works Cities collaborates with participating municipalities to review their current use of data and evidence, understand where they are utilizing best practices and identify areas for growth. What Works Cities then designs a customized approach to help mayors and city leaders use data and evidence to address a variety of local issues, including economic development and job creation, public health, and social services.



What Works Cities' support is guided by the **WWC Standard**, which reflects a set of principles and systems that create a strong foundation for the effective use of data and evidence in city government. The components of the WWC Standard reflect the kinds of work city leaders have taken on across the United States to advance What Works practices in their cities:

1

Commit

What Works leaders make powerful, public commitments to getting better results for their residents by using data and evidence.

2

Measure

What Works cities advance toward goals by measuring progress and outcomes, prioritizing transparency, and using appropriate tools.

3

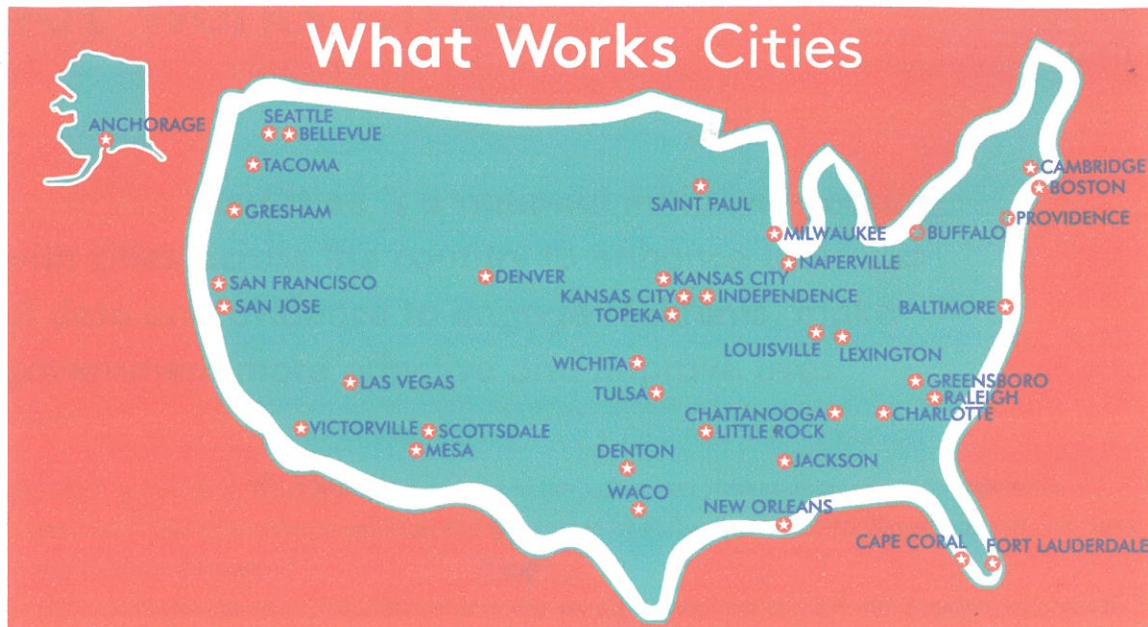
Take Stock

What Works Cities leaders consistently review and reflect to measure progress, learn, and make adjustments and improvements.

4

Act

What Works Cities leaders use data and evidence to inform major decisions and take action.



As of April 2016, 39 cities in 25 states have been selected to join the initiative.

Our cities represent a diverse cross-section of the country, demonstrating that all types of cities can be What Works Cities. Many of these local governments have already made substantial progress through their work with What Works Cities by passing open data policies, engaging the public with city data, launching performance analytics programs to define and track progress on city goals, and undertaking new efforts to evaluate programs and manage contracts more effectively.

Participating cities receive expert guidance and technical assistance from What Works Cities' partner organizations:

- **Results for America** ensures a world-class experience for all participating cities, coordinates the operations of the What Works Cities initiative, and advances a nationwide dialogue on the need for cities to use data and evidence in decision-making.
- **The Center for Government Excellence at Johns Hopkins University** works with cities to assess the current state of What Works practices, and supports implementation and enhancement of open data and performance analytics programs.
- **The Government Performance Lab at the Harvard Kennedy School** supports cities in improving the results they achieve with their contracted dollars.
- **The Sunlight Foundation** helps cities craft meaningful and sustainable open data policies.
- **The Behavioral Insights Team** helps cities conduct rapid, low-cost evaluations of programs so they can continually improve city services.

What Works Cities is also creating a growing community of cities that share learnings and best practices that will continue long after the technical assistance has ended. We are building a movement of cities around the country that are demonstrating how powerful these practices can be in improving the strength of cities and the lives of their residents.

To learn more about the What Works Cities initiative, visit www.whatworkscities.org

About Bloomberg Philanthropies:

Bloomberg Philanthropies works in over 120 countries around the world to ensure better, longer lives for the greatest number of people. The organization focuses on five key areas for creating lasting change: Arts, Education, Environment, Government Innovation and Public Health. Bloomberg Philanthropies encompasses all of Michael R. Bloomberg's charitable activities, including his foundation and his personal giving.

For more information, please visit bloomberg.org or follow us on Facebook, Instagram, and Twitter @BloombergDotOrg.

H1_2016_02

October 21, 2016 Hearing

National Prevention Science Coalition to Improve Lives:

Diane Fishbein

An Automated Evidence-Based-Policy Clearinghouse for Researchers, Practitioners, Federal Agencies, and Policymakers: A Proposal to the New Evidence-Based Policymaking Commission

We are aware of your new [Evidence-based Policymaking Commission](#), recently created by Congress and signed into law by President Obama. The bipartisan members who conceived of the need for this Commission are to be congratulated—a recognition of the need to infuse scientific evidence into the decisions of policy-makers is the first step to effectively designing policies that improve our lives while not wasting tax-payer money on unproven strategies.

Our understanding is that Commissioners have been charged with three general tasks: (1) to improve the federal data infrastructure while respecting privacy and security concerns; (2) to incorporate outcomes measurement, cost-benefit data, evaluation, randomized controlled trials (RCTs), and rigorous impact analysis into federal program design; and (3) to consider the value and nature of a clearinghouse that would facilitate access to data by various constituencies and enable the research community to judge what works and what does not.

The Commission will focus on ways to incentivize the rigorous evaluation of programs and policies that aim to reduce the problems associated with detrimental prevailing conditions and promote more healthful and productive outcomes. Until now, many programs we invest in do not possess stringent indicators of their effectiveness and, thus, there is no justification for their continuation.

There is a wealth of data already collected by the federal government and other agencies and organizations reflective of a broad range of phenomena, from physical health to juvenile and criminal justice to climate change. Existing data reserves are currently not well organized and thus an infrastructure is needed to increase the utilization of these data.

To facilitate the process of organizing and fully utilizing the data, we recommend a means to directly and expeditiously improve policy decisions. Our proposal is highly compatible with the law by incorporating federal agency and other data, as well as methodological components that will be readily accessible and understandable to those who stand to benefit. And we believe there will be widespread support from Congress, the White House and a number of organizations which have an interest in evidence-based policy-making.

We propose that the federal government (and expert contractors) develop an automated clearinghouse—perhaps called the “National Evidence-Based Toolkit for Intuitive Navigation” (NETIN)—that will provide comprehensive information regarding evidence-based programs and policies (EBPs) to users; e.g., researchers (who can populate the database), policy-makers (who need to know what to legislate and fund), and community organizations, practitioners and government agencies (that need to identify best practices). The data populating this toolkit will provide parameters needed to readily map available EBPs to existing needs, whether that be to identify best violence prevention practices for any given community or to determine which policies to fund to reduce poverty. Also needed is flexibility to include innovative and/or promising programs that have yet to be subjected to rigorous evaluation but are in the database denoted by their stage of development and need for further study (as per the #2 mandate above).

Parameters will be intuitively searchable and fields will be delineated by relevant characteristics; e.g., outcome of interest (e.g., diabetes, violence, contaminated water); setting (e.g., school, family, community, national); target population (e.g., special needs children, parents, community stakeholders, minorities); implementation protocols and frameworks (costs, timeline expectations to achieve impact, strategies to shift resources from existing to promising or evidence-supported approaches); pertinent literature and resources on assessing and utilizing research; cost-benefit analyses; and other information deemed helpful. The goal is to provide a comprehensive, one-stop resource that is more user-friendly and searchable on dimensions that are not currently available, providing an efficient and valid method to guide evidence-based policy-makers and others who might benefit from the resource.

The system would be both iterative and interactive; e.g., a search for a category of programs may elicit a notation about the need for extra diligence or a particular protocol for implementation. Or reference materials may be recommended if using certain interventions. At all stages of navigation, weblinks would lead to relevant information.

Finally, the Clearinghouse would provide a searchable methodology section for researchers who want to fill in gaps in the Clearinghouse database. There would be guidance on design, methods, statistical techniques, evaluation protocols, and strategies for translation.

We realize this will be a very large and complex undertaking that will take years to complete and will require continual updating. There will also be a need to establish criteria and thresholds for designating programs and policies as evidence-based, not only relative to the statistical findings from RCTs, but the population significance of those results (e.g., how broadly are effects achieved?). Fortunately, there are a number of existing registries that evaluate programs; they can be utilized and integrated as best seen fit. The Commission and their advisors will also want to make decisions about what policy areas to cover (from human behavior and health to security, the economy, and the environment). These objectives for a clearinghouse can be accomplished with sufficient funding and commitment, as well as by calling upon the expertise of evidence-based policy-making organizations, academics, researchers, current registry experts, federal government database keepers, implementation scientists, methodologists, computer scientists, and statisticians. And critical to this effort, to ensure its usability and utility, input must be sought from all potential users (e.g., community groups, policy-makers, agencies, foundations) working in concert with experts.

This proposal is reflective of what policy-makers, practitioners, stakeholders and others need to make informed, adequately justified, and effective decisions when identifying programs and policies that will serve communities and the nation. We have outlined a general roadmap for the creation of a clearinghouse—the Commission’s 3rd consideration—with details to be fleshed out after thorough discussion and consultation. Our hope is that the Commission will include such a plan that will bring to fruition their charge to design a data infrastructure and incorporate results from existing and newly conducted studies. There is potential to greatly improve the operations of government, the services provided to citizens, and their financial impact.

Diana H. Fishbein PhD is Co-Director of the [National Prevention Science Coalition to Improve Lives](#). She is the C. Eugene Bennett Chair in Prevention Research at the Edna Bennett Pierce Prevention Research Center at The Pennsylvania State University in State College, Pa.

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260-568-0116*



H1_2016_03
October 21, 2016 Hearing
American Evaluation Association
Presenter: George Grob

Statement of

George F. Grob
Chair, Evaluation Policy Task Force
American Evaluation Association

For the Commission on Evidence-Based Policymaking

**The Value and Methods of Evaluating
Government Programs Throughout Their Life Cycle**

Rayburn House Office Building
Washington, D.C.
October 21, 2016

American Evaluation Statement for the Commission on Evidence-Based Policymaking

Thank you for the opportunity to discuss the important topic of evaluation of federal programs. I am a professional independent evaluator, formerly Director of Evaluation at the Office of Inspector General, Department of Health and Human Services and the Federal Housing Finance Agency. I am writing as Chair of the Evaluation Policy Task Force of the American Evaluation Association (AEA), the professional organization devoted to the application and exploration of evaluation in all its forms since 1986.

AEA has approximately 7,000 members across all 50 states, as well as 80 other countries. Members have gathered together from many interdisciplinary fields (such as public policy and administration, political science, economics, statistics, psychology, sociology, education, public health, demography, ethnology, etc.) to create a community of learning and practice over the past three decades. Members in academe have worked to develop, refine, and teach evaluation methods, while members in practice have served the evaluation needs of many organizations including agencies across the federal government. Members serve in many federal evaluation, policy, and inspector general offices, and at the Office of Management and Budget.

AEA has developed professional standards for the quality of studies and ethics for the multidisciplinary members of the field. Of particular interest today is AEA's paper: *An Evaluation Roadmap for a More Effective Government*. This document describes many types of evaluation that can address management requirements, as well as principles and practices for ensuring evaluation quality and usefulness, including methods, human resources, budgets, independence, transparency, and professional ethics in a government setting. For your convenience, I have attached a copy for your reference.

I focus here on three main topics: 1) the importance of evidence and the availability of data for government decision makers; 2) evaluation methods; and 3) evaluation in government settings.

Evidence and Data for Decision Makers

Government decision makers, including both the Congress and Executive Branch agencies, need appropriate evidence to make informed decisions to assess and improve the relevance, efficiency, and effectiveness of government programs, policies, and activities (hereafter "programs"). 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.

Federal program design should include an appropriate evaluation framework to guide data collection and use over the life of a program. This includes data needed for rigorous impact evaluations as appropriate. Measures of a program's key processes and outcomes should be established while the program is being conceived and developed. In fact, taking time during the process of conceptualizing a new program to specifically define expected outcomes is most useful in establishing relevant metrics. Preliminary metrics should be put into place by the time program implementation begins, thus allowing key data to be collected to monitor program

implementation, determine progress, and set the stage for methodologically rigorous studies. It is vital for some study methods that data be collected prior to the program intervention.

We support the Commission in its efforts to consider *whether and how a clearinghouse for program and survey data should be established*. We encourage efforts to ensure that verifiable, reliable, and timely data are available to permit the objective evaluation of programs, including an assessment of assumptions and limitations in such evaluations. Agencies should use evolving best practices for data security, and ensure that publicly available data are aggregated or otherwise stripped of all information that could be used to identify particular individuals or businesses.

The proposed clearinghouse could also serve as a repository for the evidence contained in evaluation reports, providing 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.

While recognizing the high value and strategic importance of large-scale archives and datasets, the availability of these existing data should not reduce the capacity to gather targeted data as needed to address important program evaluation questions.

Evaluation Methods

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 believe that the key to such evaluation activities is for federal entities, (including Congress, as well as Executive Branch agencies and the White House Office of Management and Budget (OMB)), to identify the important evaluation questions that they need answered to effectively direct the future of Federal programs. Such questions could be effectively embedded in authorizing legislation or in congressional committee reports associated with legislative authorizations or renewals. Executive Branch agencies can do so in their budget documents and implementation plans. Evaluators, in consultation with other experts, can then identify which scientific methods are best suited to answer those questions. Specifically defining program activities and expected outcomes has proven very useful in choosing relevant evaluation questions about program operations and impact.

Such questions, and associated evaluations, are needed throughout the life cycle of programs, from their initial authorization through all phases of their implementation. For example, during early stages in the life of programs, key questions might center on the fidelity of their implementation with statutory requirements and on early implementation problems and successes. As the program matures, decision makers might want to establish metrics to track such features as enrollment of intended beneficiaries or establishment of required administrative systems and other infrastructures. Gradually, interest may shift to outputs, in terms of benefits provided and beneficiaries served. Ultimately, decision makers and citizens will want information about the impact of programs on people’s lives, the economy, public health, safety,

or other factors or goals associated with the purpose of the programs. Throughout the life of the programs, government officials and taxpayers will want to know if funds are being misspent or wasted.

While interest will ultimately focus on program impact and value received for investments made, citizens and decision makers do not want to wait until a program has run its course and then determine whether it has been working. Along the way, they will want to know if implementation problems can be corrected and whether the programs can be improved.

All of these questions are important. But the methods for answering them can be complex. Evaluation professionals have a broad range of methods—based on research— from which to draw on to answer both impact and operational process questions. Rather than legislating, requiring, or overemphasizing any single specific method for impact analysis in federal guidance, AEA recommends that federal policy require that careful consideration be given to a range of evaluation methods that may be appropriate or feasible in any given circumstance.

Over the years, the evaluation field has developed an extensive array of analytic approaches and methods that can be applied and adapted to a wide variety of programs and circumstances, depending on the program's characteristics and implementation stage, the way the results will be used, and the kinds of decisions that need to be made. In designing evaluation studies it is important to recognize that every method has pros and cons and strengths and weaknesses that must be addressed in matching them to answer the specific questions, circumstances, and intended uses of results. There are real-life factors which can render designs infeasible, impractical, or inappropriate. To ensure adequate deployment, every study design must examine and address feasibility constraints, including resources (funding and time limits), conditions in the field, ethical considerations, stakeholder concerns, etc. All evaluation methods should be context-sensitive and have cultural relevance.

Agencies should not only focus on tools for evaluation inquiry, but foster evaluation thinking as well. High-stakes program decisions should be based on a preponderance of evidence developed using sound methods. Some programs may need a high level of credibility and precision in the portfolio of evidence upon which leaders base a decision. This may require multiple studies and methods as well as a combination of process and impact evaluations to assess and understand the effectiveness of an approach within the portfolio of evidence. A range of analytic methods may be needed, and often several methods—including quantitative and qualitative approaches— should be used simultaneously. Multiple methods can offset the shortcomings of any one method with the strengths of another.

In fact, some decisions about how to improve the reach and impact of a given program may not require a high level of precision or a large portfolio of evidence. Some evaluation approaches are particularly helpful in a program's early developmental stages, whereas others are more suited to ongoing and regularly implemented programs or to ex-post analysis of temporary programs upon their completion. The broader policy and decision-making context also can influence which approach is most appropriate. Sometimes information is needed quickly, requiring studies that can use existing data or rapid data-collection methods; at other times, more sophisticated long-term studies are required to understand fully the dynamics of program

administration and beneficiary behaviors. Moreover, different approaches can complement one another.

The opportunity to capitalize on early successes, identify implementation impediments, or make mid-course corrections is critical. So it is essential to conduct ongoing formative evaluation throughout 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 questions at each 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.

Today we see considerable interest in impact analyses, including randomized controlled trials. No doubt these are valuable tools and have their place. But we wish to emphasize that they represent only some of the methods that can and should be applied, depending on the questions that need to be answered. They are not intrinsically better than other methods, except in those circumstances where they are most appropriate and feasible. An overarching focus on these methods to the exclusion of others will deprive decision makers of valuable insights about ways to improve program effectiveness and efficiency, and, when appropriate, whether to increase or diminish program funding.

Most federal evaluations need to go beyond estimating aggregate impacts to also addressing "what works for whom, and under what circumstances." If the data from evaluation studies are to be of most use in guiding evidence-based decision making, they need to be able to support conclusions about how program impacts vary across subgroups of those affected by the programs and also conclusions about the contexts in which the specific program activities are most effective.

Numerous examples are available of evaluations that have enhanced the effectiveness and impact of programs but that were conducted early in the program's life. One that comes to mind is the evaluation conducted by the Institute of Medicine during the first five year of the PEPFAR program. This was done at the request of Congress, embedded in the original authorizing statute. It provided feedback on implementation issues that was available to decision makers at the time of the program's first reauthorization. It is fair to speculate that this early feedback contributed to the impact of that program from that time forward, and in many ways was as or more impactful than studies performed in later years.

Other studies can affect programs and their impacts when performed several years into their implementation. One example is a series of evaluations and audits that identified serious problems of service quality, cost, and fraud within Medicare's home health program. Based on those studies, the Congress reformed the structure of the program, leading to savings of some forty plus billions of dollars and the abandonment of participation in the program by many high risk providers. These impacts were verified by independent reviews conducted by the Government Accountability Office. It is especially noteworthy that it was not a single impact study that led to these reforms, but rather by a body of work spanning several years.

Many other evaluation studies that lead to improved program impact and efficiency are documented on the websites of various Federal Offices of Inspectors General. They illustrate the value of using a body of work and mixed methods to assess both implementation and effectiveness of federal programs.

Evaluation Capacity in Government Settings

AEA believes that all federal entities should have the ability and should be encouraged (and in some cases, required) to evaluate programs. However, each agency or department should develop structures and plans for their evaluation functions that are best suited to their missions, organizational structures, stakeholders, environments, timing of and need for evidence in decision making, and available resources.

Because evaluation should serve as an essential core function in good governance, agencies should be required to apply the findings and conclusions of evaluations to program design, management, reform, expansion, or termination—ensuring that policy formulation will be more open, consultative, and evidence-informed. Agencies should, to the extent practical, conduct impact evaluations on pilot programs before attempting to expand or replicate them.

A framework for the planning and conduct of evaluations should also include:

- a. A public evaluation policy statement
- b. A sound procedure for establishing annual and multi-year evaluation agendas and timetables
- c. Consultation with appropriate congressional committees, OMB, and other external program stakeholders on their information needs
- d. A dissemination plan, preferably with public access
- e. Resources needed to support evaluation, and
- f. Plans 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.

The organizational structure of evaluation efforts is also important. Thus, it is vital to ensure an appropriate mixture of independence and collaboration between the evaluators and program offices with regard to evaluation design, conduct, and reporting. Consultation is needed to ensure relevance, but independence is needed to ensure impartiality. Depending on the unique organizational structure of each agency, an independent central evaluation office could be responsible for: developing and promoting program evaluation expertise throughout an agency; planning, conducting or procuring evaluation studies; and ensuring appropriate follow-up of evaluation findings and recommendations.

Adequate staffing of evaluation units and support for professional development is also necessary if the Commission's work is to achieve the kind of benefits foreseen by Congress. To ensure that decision makers use the evidence produced in evaluation studies, agencies should invest in training those staff responsible for program design, implementation, and management regarding the proper conduct of evaluation and the use of findings in program decision making.

Summary

1. Government decision makers must have appropriate credible evidence to make informed decisions regarding the structure and operations of federal agencies and policies, and to maximize their effectiveness and efficiency.
2. For key decision points within programs, federal entities (including Congress, executive branch agencies, and OMB), should identify important evaluation questions. Evaluators, in consultation with program officials, should select methods best suited to answer those questions.
3. All federal entities should have the authority and resources to conduct evaluations, and should be encouraged (and in some cases, required) to evaluate various programs. However, each agency or department should develop structures and plans for those evaluation functions best suited to their mission, organizational structure, stakeholders, environment, and timing of and need for evidence in decision making.
4. Recognizing the importance of assessing program effectiveness, 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 throughout the program's life cycle.
5. The proposed Evidence Clearinghouse should serve as a repository for the evidence contained in evaluation reports and as an archive for the collection, dissemination, and preservation of knowledge and lessons learned from evaluation studies.



Rachel Fishman, Senior Policy Analyst at New America

Submission for the First Public Hearing of the Commission on Evidence-Based Policymaking (CEP)

Abstract: The US Department of Education puts out \$130 Billion a year on federal financial aid to help students go to college, and billions more are spent by other federal agencies on higher education through tax credits, the GI Bill, and more. Despite having a tremendous amount of administrative data, policymakers, students, and families know shockingly little about how particular schools and programs are serving students due to a law banning the connecting of these data sets. In an era when college has never been more important nor more necessary, we believe this issue is one the Commission should address directly.

Oral and Written statement: Thank you for the opportunity to speak today about the better use of existing higher education data to support improved decision making by families and policymakers. My name is Rachel Fishman and I am a Senior Policy Analyst at New America in the Education Policy Program which uses original research and policy analysis to help solve the nation's critical education problems.

It's hard to open a newspaper or turn on the television these days without finding another report of the questionable value of college degrees. As anxiety over student debt and college costs reaches new heights, the public is growing increasingly uncertain about the value of a college education. The answer to the question "Is college worth it" is an unequivocal "yes." *On average.* But the real question is: In which program, at which college, at which price and for which students is it worth it?

Students, families, and taxpayers are spending unprecedented amounts on higher education, but remain largely in the dark about *how* to spend these precious dollars. And while colleges and universities spend hundreds of thousands of hours collecting and reporting data, they don't know how their students are faring compared with similar students at similar schools. Institutions of all types are subsidized with hundreds of billions of dollars a year in federal financial aid (not to mention billions more in tax credits, GI Benefits, Department of Labor funds, and more), but taxpayers don't know if these dollars are being wasted at diploma mills or poor-performing institutions. Policymakers have no sense of whether their reforms and investments are helping or hurting the families that most need the boost higher education can provide. At a time when higher education has never been as important or as expensive, it's unimaginable that we can't answer these critical questions.

Why can't we answer them? Because the federal government either doesn't have—or can't use—the right data. That's true, not because it is technically impossible, but because it is illegal. In 2008, Congress passed a law that banned the creation of a federal student unit record system to enable *existing* data systems to speak with one another and answer critical questions.

The current hodgepodge of data systems cannot answer basic question like:

- How do part-time and older learners fair in the current system?
- What happens to students who transfer from particular colleges?
- How many—and which—students complete at particular colleges?
- Do students who get some of the more than \$30 Billion spent annually on Pell Grants graduate?
- Are graduates able to find jobs that allow them to pay down their debts?

A system that uses already-collected administrative data would allow us to answer these questions.

Creating a Student Unit Record would not require the collection of additional student data, but would allow the connecting of existing data already held by a variety of federal and state agencies. Protecting these data at all points of the lifecycle is crucial, and it is worth considering housing such a system in the Department of Education's National Center for Education Statistics, which is classified as a statistical agency and therefore subject to stringent privacy and security requirements under the Privacy Act of 1974, the Education Sciences Reform Act of 2002 (ESRA), and the E-Government Act of 2002. We can also look to state level systems for best practices that could be implemented at the federal level.

We believe using existing administrative data to better understand the outcomes of students at our nation's colleges is exactly the type of critical policy issue the Commission was designed to address. We know we have just scratched the surface here today and we will provide much more detail about the existing administrative data sources as well as privacy and policy considerations in separate written comments. Thank you for your time and attention and I look forward to answering any questions.

Commission on Evidence-Based Policymaking—Public Hearing**Friday, October 21, 2016**

Comments submitted by:

Amanda Janice Roberson, Research Analyst

Institute for Higher Education Policy

Abstract: The current postsecondary data infrastructure is fragmented and incapable of answering a number of important questions about how our students fare in the higher education system. Key stakeholders, including policymakers, institutions, researchers, and the students themselves, need better information about college access, progression, completion, and post-college outcomes. Given the federal government's substantial investment in postsecondary education, it is imperative that existing data – at the institutional, state, and federal levels – are leveraged to answer these critical questions. By fostering these data linkages and removing existing legal barriers, the Commission can create a system where data drive efforts to increase postsecondary success and close equity gaps.

Oral and Written Statement: Chairman Abraham, Co-Chair Haskins, and commissioners: thank you for the opportunity to address the Commission on Evidence-Based Policymaking on the importance of a cohesive postsecondary data infrastructure and its impact on evidence-based policymaking.

My name is Amanda Janice Roberson and I am a research analyst with the Institute for Higher Education Policy. IHEP is a nonpartisan, nonprofit organization committed to promoting access to and success in higher education for all students, with a focus on students who have been underserved by our postsecondary system. Based here in Washington, D.C., we believe that all people, regardless of background or circumstance, have the opportunity to reach their full potential by participating and succeeding in higher education.

In support of this goal, IHEP leads the Postsecondary Data Collaborative (PostsecData), a partnership between more than 35 organizations committed to the responsible use of high-quality postsecondary data to improve student outcomes. PostsecData partners represent a broad range of constituents, including groups that represent students, postsecondary institutions, the workforce community, and state and federal policy influencers and researchers.

Since 2014, IHEP has spearheaded research on which data should be collected, how metrics should be defined, and through which mechanisms our currently disconnected, duplicative, and incomplete data systems can work together to create a cohesive postsecondary data ecosystem. IHEP supports the mission of this Commission to analyze and make recommendations for streamlining federal data and data systems. We suggest the following actions to improve the landscape of postsecondary data for use by policymakers, students and families, institutions, and researchers.

- **Promote best practices in privacy and security for interconnected data systems.** Recommendations by the Commission for data linkages should address the importance of privacy, security, and confidentiality. As institutional practices and changing laws at the state level have led to confusion around when it is permissible to share or link data, policies and procedures from the Commission should be transparent, consult with data security experts to implement field-recognized best practices, and ensure that all publicly reported, aggregate data are stripped of personally identifiable information.

- Leverage existing data to decrease burden, streamline reporting, and answer critical questions.** Data from sources like the U.S. Department of Education (which houses the National Student Loan Data System [NSLDS] and Integrated Postsecondary Education Data System [IPEDS]), Social Security Administration (SSA), the Department of Defense (DoD) and Department of Veterans Affairs (VA), among others, should be linked and leveraged to create a more complete picture of the higher education landscape. These sources provide valuable data on important subgroups of students who are often overlooked, including Pell grant recipients, student loan borrowers, and student veterans. If linked, these data would produce valuable information about enrollment and completion rates, and post-college employment and earnings. The Commission should consider ways to increase capacity and funding available to streamline processes and link data, as these are the primary challenges for state and local level data linkages.
- Expand access to wage and labor market information for postsecondary outcomes.** In an era of scarce resources, the value of a postsecondary degree has never been greater, and post-college outcomes are increasingly important to policymakers and students. Now, data and metrics on employment and earnings are limited to voluntary initiatives, like College Measures, state dashboards, and the College Scorecard, revamped in September 2015. The Commission should explore datasets, like the Census Bureau’s Longitudinal Employer Household Dynamics (LEHD) program or the National Directory of New Hires (NDNH), which both utilize state Unemployment Insurance (UI) wage records, or the Social Security Administration and Internal Revenue Service tax records, to understand the return on personal investment of students and families and federal investment in higher education.
- Align definitions and metrics across federal laws.** Establishing common definitions for data metrics across federal laws like the Higher Education Act, the Workforce Innovation and Opportunity Act, and the Perkins Career and Technical Education Act could reduce administrative burden and create comparable outcomes across federal programs. Common and consistent metric definitions in the postsecondary ecosystem would make it much easier to link data between local, state, and federal sources and allow for accurate comparisons.
- Recommend that Congress overturn the ban on a federal student-level data system.** The statutory ban on a federal student unit record system stifles the ability of policymakers to answer questions about our postsecondary system, limits the information available to consumers, and imposes unnecessary burden onto institutions. The Commission should recommend to overturn the ban and direct the U.S. Department of Education to engage with the higher education community to design and implement a student-level data system. This system would create a nationwide, inclusive data set that shows how students move through higher education and their post-college outcomes. This system would allow for disaggregation by key student characteristics, like Pell Grant receipt, race/ethnicity, and others, and illuminate evidence for future policymaking around closing equity gaps and the federal investment in higher education and postsecondary programming. Given the sensitive nature of record level data, the Commission should also recommend rigorous data privacy and security policies to govern this system.

Thank you for your time and the opportunity to provide a statement to the Commission. I look forward to answering any questions.



Abstract

Policymakers are making decisions about higher education without crucial performance measurements. The Commission on Evidence-Based Policymaking represents a unique opportunity to address this problem, and collect and use the information students prioritize the most: how different colleges serve today's diverse student bodies, which majors and programs lead to specific occupations and industries, and whether students are repaying their student loans.

Statement

Thank you for the opportunity to speak before you today. My name is Tom Allison and I am the Deputy Director of Policy and Research for the Young Invincibles, a national research and advocacy organization working to expand the economic opportunities for young adults.

We know a lot about college and universities: how much schools charge for tuition and fees, how many students they enroll, and what types of programs or majors they offer.

We also know a lot about jobs and workforce trends: how many people are unemployed, how much money different types of workers make, which industries are growing and shrinking, and what skills employers are looking for in their workers.

The problem arises however, when attempting to draw connections between what we know about colleges and universities, and what we know about jobs and the workforce. Preventing us from connecting that link, is the Student Unit Record Ban, a single paragraph in the 2008 reauthorization of the Higher Education Opportunity Act, prohibiting the Department of Education from collecting and using student-level data. This is frustrating for today's students, who carry challenges and aspirations unique from previous generations, and the majority of which pursue higher education to improve their economic opportunities. Choosing where to go to school, what to study, and how to pay for it comes with the highest stakes of any decision in their life. Students and families need and deserve better insight to inform these decisions.

Moreover, without outcomes information on which schools and programs lead to jobs and ultimately financial security for their graduates, policymakers are left in the dark, unable to intelligently align funding with policy priorities. Colleges are also blind to students' trajectories after they leave campus and cannot adjust academic programs or systems to ensure students can land good jobs or pursue further education.

Over the course of two years, Young Invincibles conducted workshops, listening sessions, and roundtable discussions with current and aspiring college students across the country to better understand their priorities and values in attending and paying for college. We synthesized their voices in the Student Agenda for Data Reform and organizations representing over one million students currently support it. We will submit it in our written comments to the Commission, but in brief the agenda calls for overturning the student unit record ban, collecting more information about innovative platforms and alternatives to traditional higher education, and to protect the privacy and security of sensitive student information.

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I'd like to dedicate the remainder of my time to read comments from a former student leader and recent graduate from the University of Nebraska, named Thien, whose story illustrates the need to improve our postsecondary infrastructure:

As a 17-year-old, I did not have nearly enough knowledge of federal loan programs, extra college fees, trends in increasing tuition costs, or credit transferability to make the best possible decision when considering the investment I was making in paying for school. Some online tools can be helpful in estimating front-end costs, but they do little to educate on what life after graduation, or dropping out, would bring. It only takes a few clicks for a student to receive thousands of dollars in loans, but some can end up repaying them for decades afterward. Colleges need to be more transparent when advertising their costs by also informing prospective students on the costs that go along with repayment.

We need more information on which schools best serve first generation and minority students like myself to feel comfortable and assured we'll find a college committed to our success. A college campus can be a very unfamiliar environment when you don't have family members to help navigate the strange new setting. Our institutions of higher education need to paint a more accurate picture of their minority communities, and the rate of success of those communities experience after graduation, including how prepared they are for the workforce. It's a great resource for some of us, who are not used to asking for help and may let ourselves fail out of college before mentioning anything to anyone, but it's frankly not enough.

I can't speak for every low-income, first generation, minority college student in America, but I know these words resonate with a lot of my peers. While we know we need to take the reins of our own success, we need to be empowered to do so, and it is clear that there is a lot of information that needs to be made available before students can make a decision that will impact the rest of their lives and those close to them. What we need right now is better data, more of it, and to have it in a transparent and easily digestible form.

You can read the rest of Thien's story and others on our website. Thank you for your time.

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Critical Issues for the Commission on Evidence-Based Policymaking

Statement from Workforce Data Quality Campaign

The Commission on Evidence-Based Policymaking's examination of federal administrative and survey data provides an exceptional opportunity to address the management and use of data for measuring postsecondary education and workforce outcomes. The Commission's findings and impact could lead to more inclusive, aligned and market-relevant data systems to help educators, students, employers, workers and policymakers all make more informed decisions.

Workforce Data Quality Campaign (WDQC) is a non-profit initiative that promotes inclusive, aligned, and market-relevant education and workforce data. We engage hundreds of national experts, state officials, and workforce development advocates, encouraging the use of data to ensure that all of our nation's education and training programs are preparing students and workers to succeed in a changing economy. Given our mission, we are excited about the promise of the Commission's work, and are pleased to have the opportunity to share our recommendations.

Data collected and held by the government could help to answer a range of important postsecondary education and workforce questions, such as:

- Which skilled positions are employers having a difficult time filling, and what institutions might they look to for recruitment?
- Are recent college graduates finding jobs and earning good wages?
- How much do students borrow, and can they repay these loans?
- What types of education and training pathways are helping people succeed in careers?
- Which program models are most effective at helping target populations (e.g. ex-offenders, veterans, low-income individuals) gain skills and find stable employment?
- How can workers know which short-term credentials would likely raise their earning potential?
- What job search strategies are most effective, and for whom?

In some instances, surveys have been able to answer those questions over a limited time frame, but with great effort and expense. A growing number of state longitudinal data systems are linking administrative records to answer questions. However, geographical coverage is limited, so they cannot answer questions about students who leave the state, or compare outcomes across states. The federal government already collects data through numerous administrative sources, in addition to conducting regular surveys. With improved coordination, these data could be systematically shared and linked to answer those and other critical questions for generations to come.

Issues for Action

Strides have been made in recent years, but much information remains separated between agencies because of technological, cultural, and legal barriers. WDQC encourages the Commission to recommend the following actions in its final report:

1.) **Expand access to wage information**

The Commission should examine how the federal government can build on existing data collections and facilitate the linking of employment and earnings data across higher education and training programs.

Students and workers want to know which education and training programs will help improve their chances of having successful careers. Researchers need access to more detailed and comparable data on programs to analyze which pathways are working for students and workers. Agencies at all levels of government want to know the short- and long-term employment outcomes of those they have served.

Potential relevant data sources include the National Directory of New Hires and the Census Bureau, which contain Unemployment Insurance wage records submitted by states. The Internal Revenue Service and the Social Security Administration have individual tax records. In limited instances, agencies have found ways to use these data to show employment outcomes for programs, but the federal government needs to create efficient, strategic processes for managing employment data. The Commission should consider how a federal clearinghouse could streamline employment data collections and rationalize processes for access, while protecting privacy and enhancing security.

2.) **Improve information on postsecondary progress and outcomes**

The Commission should examine ways — such as establishing a federal student record system — to measure postsecondary student progress and more effectively and efficiently answer important consumer and policy research questions.

Stakeholders do not have access to comparable information at the program level, and in many cases, only students receiving financial aid; attending first-time, full-time; or those pursuing two or four year degrees are counted. These limitations exclude non-degree credentials that are growing in number and importance, as well as the transfer, part-time, and adult students who now outnumber “traditional” postsecondary students. The Department of Education’s College Scorecard and planned changes in the Integrated Postsecondary Education Data System (IPEDS) reflect progress toward providing and linking data for analysis and consumer-friendly interfaces, but the information remains scattered and incomplete. Overturning legal prohibitions on federal collection of data on individuals involved in postsecondary education and training programs, and implementing a national student record system, would allow for building a more complete picture with lower administrative burden.

3.) Provide more accessible labor market information

The Commission should include in its examination how labor market information (LMI) might be better integrated to provide more comprehensive and clear information.

Having access to LMI (e.g. occupational projections) may strengthen a worker's ability to make decisions about employment and training, and help to improve the alignment of education and training programs with labor market demand. The Bureau of Labor Statistics, Census, and other statistical agencies could more effectively collaborate and incorporate additional information from federal programs to enhance data about employment, worker characteristics, and the job market. If the Commission examines LMI, it should coordinate with the newly established Workforce Information Advisory Council (WIAC), which reports to the Secretary of Labor.

4.) Harmonize definitions and metrics across federal laws

The Commission should explore how the federal government could implement similar definitions and metrics to streamline reporting and improve opportunities for data linkages between programs.

State agencies and service providers often face the burden of having to report on program results using different definitions and measures, which increases staff time and cost. Using common definitions and metrics from the Workforce Innovation and Opportunity Act (WIOA) for other programs as appropriate, such as those operating under the Perkins Career and Technical Education Act, would reduce administrative burden, make outcomes more comparable, and facilitate coordination across human capital programs.

5.) Clarify privacy and security protections

The Commission should account for best practices in privacy and security as it conducts its review.

Institutional practices and changing laws at various levels of government have often created confusion around what is possible and led to blockages in sharing and linking data, even when doing so is legal. Policies and procedures recommended by the Commission should be transparent, utilize evolving best practices for data security, and ensure that publicly available data are aggregated or otherwise stripped of all information that could be used to identify particular individuals or employers. As noted by presenters in an earlier Commission meeting on privacy and security issues, the Commission should respect varying viewpoints on privacy rights. In order to strike an appropriate balance between privacy concerns and optimal use of data to improve publically-funded programs, the Commission should ensure that federal policy accounts for emerging technologies that can help protect sensitive information.

As the Commission conducts its examination, we encourage the elevation and promotion of high-quality data sources that can be used to inform human capital development policy. We hope the Commission will focus on maximizing the use of data to enhance decision-making and continually improve education and training services that allow all Americans to contribute to a 21st Century economy.



The Education Trust

Closing the gaps in opportunity and
achievement, pre-k through college.

**Commission on Evidence-Based Policymaking – Public Hearing
Friday, October 21, 2016**

Comments submitted by:
Tiffany Jones, Director of Higher Education Policy
The Education Trust

Abstract: The availability of high-quality, robust data systems is essential to helping the public understand how students are faring at particular institutions, identifying equity gaps, and better incentivizing improvement and success. Having better information on the college participation and outcomes of all students also helps ensure that students can make the best postsecondary decisions for themselves, with the billions of dollars that the federal government annually invests in student aid. We believe that the most efficient and effective way to gather complete and more honest data is through a (modified) unit record system, and we support both an effort to eliminate the current student unit record ban and an effort to expand and improve the current data collections, including, for example, data on part-time students and transfers, and making Pell status transparent in the collections.

Oral and Written Statement:

Thank you for the opportunity to speak. My name is Tiffany Jones and I am the Director of Higher Education Policy at The Education Trust. Ed Trust is committed to advancing educational opportunities for all students, but especially low-income students and students of color. We aim to advance equity in higher education by encouraging policymakers and the public to hold campuses accountable for student outcomes and supporting improvement at campuses committed to serving low-income students and students of color.

Since the original Higher Education Act (HEA) was passed in 1965, the U.S. has made substantial progress in college access. College-going rates have climbed for students from all economic and racial groups. Yet despite this progress, low-income students today enroll in postsecondary education at rates lower than high-income students did in the mid-1970s. In every category of postsecondary education, low-income students and students of color are less likely than others to earn the degrees that they want and need, and far more likely to end up with debt and no degree.

Before disaggregation of data was required in K-12, we knew anecdotally that schools were not educating all groups of students well. But we did not know just how significant the inequities were, and we didn't know which schools were making progress and which weren't.

That, unfortunately, is where we still are in higher education — especially in regard to low-income students. We have some limited research on, for example, overall Pell graduation rates, but we don't currently know which institutions are serving these students well and which aren't. Pell graduation rate data will be incorporated into IPEDS in the coming years, but to date these data have not been included in annual IPEDS data collections. IPEDS also doesn't include data on part-time students or students who don't start in the fall or students who transfer in from another college.

If we have learned anything from past experience, it is this: that students who aren't measured don't count. If you want these students to count, and I know you do, you need to make the same shift to demanding better data that you have made in K-12.

We believe that the most efficient and effective way to have complete and more honest data is through a (modified) unit record system. The current ban on a federal student unit record system makes it impossible for federal policymakers to get a comprehensive picture of how students are moving through postsecondary education and attaining degrees and certificates. The commission should recommend the overturn of the unit record ban and the ban on a federal database of WIOA data, so that we can have a nationwide, inclusive data set to show how people are moving through a variety of education pathways.

Creating a student unit record system can begin by leveraging existing resources from the U.S. Department of Education (which houses the National Student Loan Data System and Integrated Postsecondary Education Data System), Social Security Administration, the Department of Defense and Department of Veterans Affairs, among others, to create a more complete picture of the higher education landscape. These sources provide valuable data on important subgroups of students who are often overlooked, including Pell Grant recipients, student loan borrowers, and student veterans. If linked, these data would produce valuable information about enrollment and completion rates, and post-college employment and earnings.

We also support an effort to expand and improve the current data collections, including, for example, data on part-time students and transfers, and making Pell status transparent in the collections.

Thank you for having this hearing and taking an important and critical step toward advancing the quality and availability of higher education data — specifically, a step that ensures better data that can be used to empower students, families, the public, advocates, and campuses as we aim to increase higher education equity and student success.

I look forward to answering any questions.



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October 14, 2016

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October 21, 2016 Hearing
Pew-MacArthur Results First Initiative
Presenter: Sara Dube

Dear Members of the Commission on Evidence-Based Policymaking:

The Pew Charitable Trusts promotes transparency and accountability in government through the use of rational, reliable decision-making based on facts and evidence. We bring forth research that shows which policies, practices, and programs are effective. We have used this evidence-based approach to support successful home visiting programs for new mothers, evaluations of state-based tax incentives, and public safety programs to reduce recidivism. Our experience shows that helping policymakers enact evidence-based policies—those that improve states' fiscal health and enjoy broad bipartisan appeal—shifts policymakers' thinking about how to invest taxpayer dollars. As lawmakers see the benefits of evidence-based policymaking in one key policy area, they are more inclined to explore reforms in others.

One of our most successful evidence-based initiatives is the Pew-MacArthur Results First project, a joint effort of The Pew Charitable Trusts and the John D. and Catherine T. MacArthur Foundation. A growing number of states and counties are partnering with the project to make evidence-informed decisions in eight policy areas. At present, we work with 22 states and seven counties to incorporate rigorous research into their policy and budget processes and use evidence to identify and invest in programs that achieve successful outcomes and positive returns on investment.

We applaud the federal Evidence-Based Policymaking Commission's work and share your commitment to bring data and evidence to the forefront of federal decision making. We stand ready to be a resource as you consider how federal policies and practices could support state efforts to use data and research in the policymaking process—and offer our experiences at the state and county level that can inform federal level policies and practices.

The Results First approach includes:

- Creating an inventory of currently funded programs;
- Assessing which programs are most likely to work, based on the best available research;
- Utilizing the customized Results First cost-benefit model to compare programs based on their expected return on investment; and
- Using the results to inform budget and policy choices.

New Mexico has used the Results First approach to compare the expected outcomes of adult criminal justice, child welfare, early education, and behavioral health programs. Using their Results First analysis, state leaders directed more than \$100 million to evidence-based programs. In addition, the state is building a culture of evidence by incorporating evidence into their policymaking processes. For example, the Corrections Department adopted a policy that mandates that 70 percent of funds are directed to evidence-based programs. The department also adopted contracting standards that require vendors to document their use of evidence-based practices and monitor outcomes for programs that are developed in New Mexico to ensure that they meet the state's goals.

Mississippi passed legislation in 2014 establishing evidence standards for evaluating the state's corrections, health, education, and transportation programs. Using the Results First model, the state determined that a shock incarceration program—a paramilitary, boot-camp intervention—currently required by statute has been proven ineffective by national research. The legislature subsequently moved to eliminate the program in 2017, and is now developing an evidence-based alternative. In addition, the state, through its budget instructions, now requires executive agencies to justify funding for any new program by identifying evidence supporting the program's effectiveness. Mississippi policymakers expect to use this information to bolster the state's reinvigorated performance-based budget system.

New York State has used the Results First framework to target more than \$50 million in state general funds over three years toward effective evidence-based alternatives to incarceration programs. Recipients of these funds are required to show that the programs are being implemented according to their original design—demonstrating fidelity—and that they are achieving expected outcomes. The state also leveraged its Results First analysis to compete for and win a \$12 million “Pay for Success” grant from the U.S. Department of Labor.

Iowa's Results First analysis confirmed that the state's existing community-based domestic violence treatment program was not effective in reducing recidivism among domestic abusers. In fact, the model showed that the state was losing \$3 for every \$1 invested in the program. To improve outcomes for both victims and taxpayers, the department partnered with the University of Iowa to pilot an alternative program known as Achieving Change Through Value-Based Behavior, or ACTV. Preliminary results of the pilot demonstrated positive effects in reducing recidivism and the department subsequently began shifting funds away from the ineffective program and toward ACTV.

Colorado has completed program inventories and cost-benefit analyses in the adult criminal justice, juvenile justice, and child welfare policy areas, and is using their results to re-allocate funds in the FY 16-17 state budget. For example, the state will repurpose \$1.9 million in FY 2016- 17 and \$2.4 million in subsequent years for a new community corrections pilot project for at-risk offenders, centering the offender's treatment on cognitive behavioral therapy (an evidence-based program). The state has also dedicated \$7.2 million (in FY 2016-17, with investments of \$9.5 million each year after) to Communities That Care, a prevention system designed to reduce levels of adolescent delinquency and substance use through the selection and use of effective evidence-based preventive interventions tailored to a community's specific profile of risk and protection.

These are just a few of many examples of states using evidence to inform their budget and policy choices. We will submit additional examples and information in response to your request for comments via the Federal Register.

As you develop your recommendations, please consider the effect of federal policies on these state and local efforts, and feel free to contact us and our partners with any questions about the lessons learned at the state level and how they could be applied at the federal level.

Thank you,

Sara Dube
Director, Pew-MacArthur Results First Initiative
The Pew Charitable Trusts



October 14, 2016

Dear Chair Katharine G. Abraham, Co-chair Ron Haskins, and members of the Commission:

On behalf of The National Campaign to Prevent Teen and Unplanned Pregnancy, thank you for the opportunity to submit a statement for the record for the Commission on Evidence-Based Policymaking (CEP) meeting to be held on October 21, 2016. The National Campaign, a research-based, nonpartisan, nonprofit organization was founded in 1996. We work to improve the lives and future prospects of children and families by ensuring that all children are born into families committed to and ready for the demanding task of raising the next generation by reducing unplanned pregnancy among teens and young adults. The National Campaign works towards three ultimate outcomes:

- Reduce the rate of teen pregnancy by 50% by 2026.
- Reduce the rate of unplanned pregnancy among women age 18-29 by 25% by 2026.
- Reduce the disparities in teen pregnancy and unplanned pregnancy rates among racial/ethnic and socioeconomic groups by 50% by 2026.

Ensuring that young people have access to high quality, evidence-based teen pregnancy prevention education is one critical element in helping more young people delay pregnancy and parenting.

Given our long-standing commitment to research, evidence and evaluation, we applaud the establishment of the Commission and appreciate the important issues it is tackling. In this statement, we offer feedback about several of the duties the Commission is tasked with, along with information about two tiered evidence-based programs—the Personal Responsibility Education Program (PREP) and the Teen Pregnancy Prevention (TPP) Program—which we hope will be helpful as the Commission goes about its important work.

The Commission poses several important questions with respect to data infrastructure and access, including a request for examples of best practices related to linking local, state and federal data. Not surprisingly, this type of endeavor raises many technological, ethical, and legal challenges, particularly as they relate to the balance between data access and privacy. One example that may be helpful to consider is the Longitudinal-Employer Household Dynamics (LEHD) program. We highlight this program for its ability to successfully navigate challenges associated with partnership formation, privacy protection, and data access while producing data that have greatly impacted policy.

Similarly, the Commission poses several questions related to the potential benefits and challenges of developing a clearinghouse for administrative and survey data. While The Campaign strongly supports greater access to administrative and survey data, and a

clearinghouse would be beneficial in theory, we believe such an effort would likely fall short of its goals and would be difficult to maintain. It is particularly difficult to imagine a single clearinghouse that gathered data and evidence across all policy domains in a way that adequately captured the complexities of these data and the programs they reflect. Rather, we believe those resources would be better committed to helping agencies maintain and enhance the data access they already have in place. In our experience, as these agencies try to meet growing data collection costs with fixed or even diminishing budgets, the availability of policy relevant data has been shrinking in critical ways. Key questions have been cut from surveys and online access to data has been curtailed. This is particularly true as it pertains to tabulating results for states or localities. For example, one can no longer use the online vital statistics data to look at key policy questions like variation in Medicaid or WIC participation at the state level. It is also the case that some particularly rich data, such as the Medicaid Max files, are not available as de-identified files, thus making them difficult to obtain and underutilized. There are likely similar limitations in other policy domains as well. We believe that with relatively modest investments and vocal champions, data access could be greatly expanded.

We also would like to comment on the Commission's interest in how data and findings from evaluations can best be used to improve policies and programs. We offer two examples of tiered evidence grant making from the US Department of Health and Human Services (HHS) that use evaluation results to continually improve those programs.

The TPP Program and PREP, like the Maternal, Infant and Early Childhood Home Visiting program, have been recognized as pioneering examples of tiered evidence-based policymaking,ⁱ and represent an important contribution to building a body of evidence of what works. They include high quality implementation, evaluation, innovation, and learning from results. The majority of funding from the TPP Program and PREP goes toward replicating program models that have been demonstrated to change behavior using well recognized high standards of evidence. A smaller portion of funding is reserved for research and demonstration projects to develop, replicate, refine, and test additional models and innovative strategies. This ensures that the menu of effective approaches to reducing teen pregnancy will continue to grow and be refined.

TPP Program and PREP grantees can choose from a list of effective models that have been identified through HHS' ongoing systematic review of the teen pregnancy prevention research literature. Since 2009, HHS has sponsored this review of the literature to help identify models with evidence of effectiveness in reducing teen pregnancy, sexually transmitted infections (STIs), and associated sexual risk behaviors. The review, conducted by Mathematica Policy Research, looked at hundreds of evaluations and initially identified 28 models that met Tier 1 criteria. That is, they must have been evaluated using a randomized controlled trial or quasi-experimental design, demonstrate changes in behavior (not just knowledge or behavioral intent), and results must be published in a peer-reviewed journal. The evidence review is updated periodically to capture the latest evaluation studies, and now includes 44 models.ⁱⁱ The wide range of models on the HHS list of evidence-based programs gives grantees the flexibility to choose an effective approach that reflects their needs, population, and values, recognizing that what people in New York City may choose for high school age teens might be different from what people in Mississippi choose for middle school youth.

The TPP Program is a discretionary program administered by the Office of Adolescent Health (OAH) that was originally funded in FY 2010 at \$110 million. It supported an initial cohort of 102 grants for a five-year period. Funded at \$101 million for FY 2016, the TPP Program currently supports 84 competitive grants to a broad range of organizations and agencies serving youth in 39 states and the Marshall Islands. The grantees focus intensely on communities with the highest teen birth rates and the most at-risk youth. These five-year grants were awarded in FY 2015 and are contingent on continued appropriations. As noted above, approximately 75% of the grant funds are used to replicate program models that have already been shown through careful evaluation to change teen behavior (Tier 1), and approximately 25% of the funds support research and demonstration projects to develop, replicate, refine, and test additional models and innovative strategies to prevent teen pregnancy (Tier 2).

PREP, established in FY 2010, continues to be funded at \$75 million in mandatory funding annually through FY 2017. Administered by the Administration on Children and Families (ACF), PREP supports states, communities, and tribes to educate adolescents on both abstinence and contraception to prevent pregnancy and STIs, and on other adulthood preparation topics such as healthy relationships, communication with parents, and financial literacy. PREP focuses on youth at greatest risk of teen pregnancy and geographic areas with high teen birth rates. For example, 34% of grantees targeted youth in foster care and 74% target youth in high need areas.ⁱⁱⁱ Most of the PREP funding (\$58 million) supports grants to states, territories, and tribes and emphasizes the use of evidence-based programs. Indeed, more than 95% of youth served by the state grants received one of the evidence-based programs from the HHS list referenced above.^{iv} An additional \$10 million supports competitive grants to public and private entities to develop, replicate, refine, and evaluate innovative strategies to reduce teen pregnancy and repeat pregnancies among youth up to age 21. These grants are subject to rigorous evaluation and reflect a “Tier 2” approach that supports innovation, fills gaps in existing programs for underserved populations, and expands knowledge about what works.

Both programs have invested heavily in the highest standards of evaluation and learning, as well as in innovation. OAH funded 41 rigorous evaluations during the first round of TPP Program grants that ran from 2010-2014.^v The recently released findings—90% of which were from randomized control trials—indicate that four of the Tier 1 programs were found effective in changing behavior in additional settings and new populations. Among the Tier 2 grantees, 8 new, innovative models were found to be effective. Overall, these evaluations help build a body of evidence about where, when, and with whom specific models are most effective, and have expanded the menu of effective program models from which communities can choose. The results, along with implementation lessons, also help guide the second round of TPP Program grantees, and the many communities that look to the HHS list of evidence-based programs for guidance on what approaches will work best for them. Many of these findings and valuable implementation lessons were recently published in a special supplement of the *American Journal of Public Health*.^{vi} PREP grantees have also been subjected to rigorous evaluations through several different federally sponsored studies, and several studies have already been added to the HHS evidence review.

The commitment to evidence-based investments and innovation in the area of teen pregnancy prevention has been pivotal in changing the landscape. Before these two programs began, there

were no federal investments dedicated to evidence-based teen pregnancy prevention programs; research in this area had primarily come from private investments, with few resources available to replicate or further evaluate the existing models.

The National Campaign also offers PREP and the TPP program as two examples where evaluation—specifically randomized control trials and quasi-experimental designs—have been successfully incorporated into the program designs. These are two of the few government programs that use evidence and evaluation criteria throughout the grant life cycle.^{vii} In fact, only about \$1 out of every \$100 spent on federal programs is backed by any evidence that the money is being spent wisely.

We believe rigorous evaluations have been successfully implemented for a few reasons. Importantly, the legislation for both programs specifies that some portion of funds should be used for evaluation. Program requirements also signify that evaluations are a priority. For instance, PREP grantees must participate in a federally-led evaluation, if chosen, and the “Tier 2” innovation grantees are required to conduct their own rigorous evaluations, unless selected to be part of a federally-led evaluation. All TPP Program grantees are required to conduct some program evaluation, with a subset selected for rigorous impact evaluation.^{viii} In addition, there are several federally-led evaluation studies that include large, multi-state, rigorous evaluations conducted under contract to OAH.^{ix} Besides rigorous evaluations, mandatory reporting of performance measures is another way that OAH and ACF ensure grant projects are making sufficient progress toward their stated missions and that there is continuous quality improvement.

Of course, providing support for grantees is another vital component to ensuring evaluations are successful. From review of initial evaluation designs to preparation of the final evaluation reports, TPP Program and PREP grantees received ongoing evaluation training and technical assistance support to ensure rigorous methods and reporting.^{x, xi} In addition, it is essential to have a commitment to evaluation and learning from program leadership and adequate federal staff capacity to carry out that commitment. Leadership at OAH and at ACF demonstrated such commitment, built staff capacity, and worked closely with evaluation experts at the ACF Office of Planning, Research and Evaluation (OPRE) and the Office of the Assistant Secretary for Planning and Evaluation (ASPE).

In closing, thank you for considering our input for the Commission for Evidence-Based Policymaking. If you have any questions or need additional information, please contact me at 202-478-8512 or kkaye@thenc.org.

Sincerely,

Kelleen Kaye
Vice President, Research and
Evaluation

ⁱ Results for America. (2015). *Invest in What Works Fact Sheet: Federal Evidence-Based Innovation Programs*. Washington, DC: Author. Retrieved October 12, 2016 from <http://results4america.org/policy-hub/invest-works->

[fact-sheet-federal-evidence-based-innovation-programs/](#). Also, Haskins, R. (2014). *Show Me The Evidence*. Washington, DC: Brookings Institution Press.

ⁱⁱ Lugo-Gil, J., Lee, A., Vohra, D., Adamek, K., Laco, J., & Goesling, B. (2016). *Updated findings from the HHS Teen Pregnancy Prevention Evidence Review: July 2014 through August 2015*. Washington, DC: Mathematica Policy Research. Retrieved October 12, 2016 from

http://tppevidencereview.aspe.hhs.gov/pdfs/Summary_of_findings_2015.pdf.

ⁱⁱⁱ Administration for Children and Families/Family and Youth Services Bureau. (2015). *Adolescent Pregnancy Prevention Program Fact Sheet*. Washington, DC. Author. Retrieved October 12, 2016 from

www.acf.hhs.gov/programs/fysb/resource/app-fact-sheet.

^{iv} Administration for Children and Families/Family and Youth Services Bureau. (2015). *Personal Responsibility Education Program: How States Planned and Implemented Adolescent Pregnancy Prevention Programs: State PREP Performance Measures of Structure, Cost, and Support for Implementation*. Washington, DC: Author. Retrieved October 10, 2016 from

www.acf.hhs.gov/sites/default/files/fysb/prep_pm_brief_20151216.pdf.

^v U.S. Department of Health and Human Services, Office of Adolescent Health. (2016). Results from the first round of TPP grantees. Retrieved October 12, 2016 from

www.hhs.gov/ash/oah/oah-initiatives/tppe_program/cohorts-fy-2010-2014.html.

^{vi} Morabia, A. (Ed.). (2016). Building the Evidence to Prevent Adolescent Pregnancy: Office of Adolescent Health Impact Studies (2010-2015) [Special issue]. *American Journal of Public Health, 106*(S1). Retrieved October 12, 2016 from

<http://ajph.aphapublications.org/toc/ajph/106/S1>.

^{vii} A recent GAO report includes TPP in its review of five tiered evidence grant programs, noting evidence is used throughout, including for assessing the evidence base and identifying evidence-based approaches, implementing evidence-based approaches with fidelity, conducting rigorous independent evaluations, and disseminating evaluation results.

^{viii} U.S. Department of Health and Human Services/Office of Adolescent Health. (2016). TPP Evaluation and Performance Measurement. Retrieved October 10, 2016 from

<http://www.hhs.gov/ash/oah/oah-initiatives/evaluation/grantee-led-evaluation/grantees-2010-2014.html>.

^{ix} <http://www.hhs.gov/ash/oah/oah-initiatives/evaluation/federal-led-evaluation/index.html>

^x <http://www.hhs.gov/ash/oah/oah-initiatives/evaluation/ta.html>.

^{xi} Goerlich Zief, S., Knab, J., & Cole, RP. (2016) A Framework for Evaluation Technical Assistance (2016). *American Journal of Public Health, 106*(S1): S22–S24. Retrieved October 10, 2016 from

<http://ajph.aphapublications.org/doi/full/10.2105/AJPH.2016.303365>.

H1_2016_11

October 21, 2016 Hearing

Presenter: Quentin Wilson (independent researcher)

From Data to Action: Achieving Results People Care About Most

PRESENTATION TO THE
COMMISSION ON EVIDENCE-BASED POLICYMAKING

QUENTIN WILSON

WASHINGTON, DC

OCTOBER 21, 2016

Breaking Good

The effective use of good data is vital to achieving the results about which people care most.

The CEP environment includes a global consensus, bi-partisan support, high ambitions, new resources and recent successes in the use of data, analysis and evidence to improve public program performance.

The Commission agenda on data access and protection can help broaden and deepen the use of data and analysis for that purpose.

The value of this agenda can be increased and sustained to simultaneously take two big steps:

- Providing information and other resources to help speed the improvement process; and
- Linking programs performance to the high-level results about which people care most.

Global Consensus and Advancement: Using Data to Achieve Better Results

- [Tim Berners-Lee](#), Founder of the World Wide Web: The Next Web
- [UN Guidelines on Open Government Data](#) 
- White House [Executive Order](#) and 9/28/16 [Open Data Innovation Summit](#) 
- [Commission on Evidence-Based Policymaking](#)
- [Results Washington](#) 
- [Maryland StateStat](#)
- [Baltimore OutcomeStat](#)

You've Got a Friend: Emerging Research, Advocacy and Support Resources

[Governing Institute](#)

[Living Cities](#)

[Results for America](#)

[USC Civic Data](#)

[Pew-McArthur Results First Initiative](#) and [Clearinghouse](#)

[Bloomberg Philanthropies What Works Cities](#)

[Harvard Data-Smart City Solutions](#)

[Hewlett Foundation Effective Philanthropy Group](#)

[Evidence-Based Policymaking Collaborative](#)

[Postsecondary Education Data Collaborative](#)

Bill & Melinda Gates Foundation

Institute for Higher Education Policy

Caring about Data: Making a Difference on Results that Matters Most

Key Result Area

Data-Based Initiatives

Priority Outcomes

Education

College Completion

[Career & College Clubs](#)

Child Development

First Five/Parents as Teachers

Public Safety

Violent Crime

Gang intervention

Worker Safety

Highway construction process

Health

Substance Abuse
Prevention

[SAMHSA E-B Program Registry](#)

College Completion: Career & College Clubs



The Career & College Clubs curriculum uses peer-to-peer learning to empower middle school students to succeed in high school and beyond.

48%
increase
in positive responses
to the statement:

I KNOW HOW TO GET
the college information I need.

47%
increase
in positive responses
to the statement:

I KNOW THE COLLEGE
application process.

41%
increase
in positive responses
to the statement:

I KNOW WHAT COURSES
and tests I need to take to be
eligible for admission to a
4-year college or university.

9%
increase
in positive responses
to the statement:

I KNOW WHAT CAREER
I want to pursue, and what I
need to study in college
to achieve my career goal.

Data Making a Difference - II

Key Result Area

Priority Outcomes

Economic Prosperity

Strong Neighborhoods

Employment Opportunity

Effective Government

Energy and the Environment

Data-Based Initiatives

Blight Reduction
Housing

[Pathways to Careers](#)

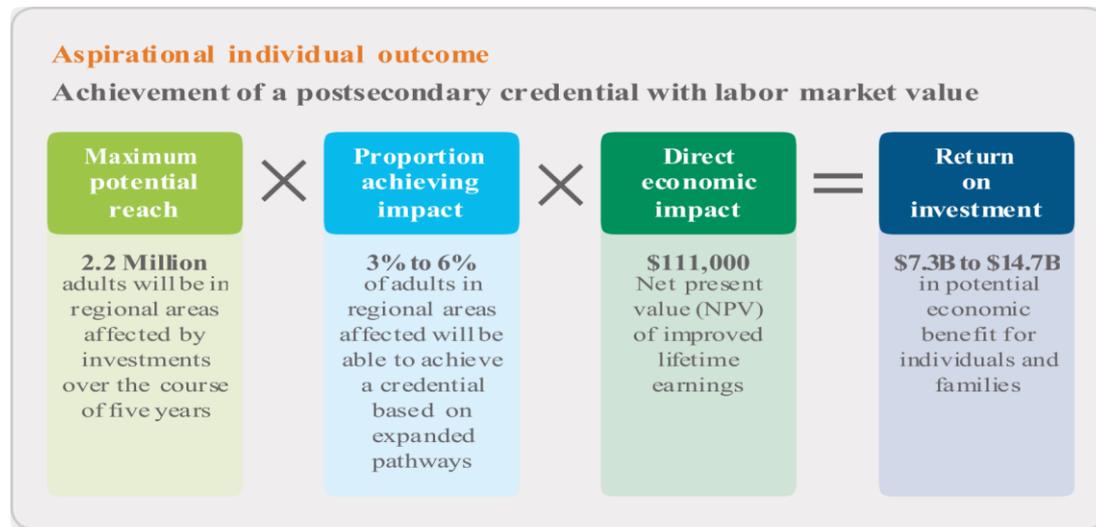
Santa Monica FD
[Missouri Dept. of Revenue](#)

Economic Prosperity: Bridgespan's Billion Dollar Bet on Pathways to Careers

Data-based research-driven proposal

Potential investments in six result areas “emphasized the need to better track and manage data.”

Results measured by Return on Investment (ROI) model. (10X)



State Initiatives: California Performance Excellence Resources

- [California Data Collaborative](#)
- [California Evidence-Based Clearinghouse](#)
- [California Open Justice initiative](#)
- Open Data tech firms
- Local government leaders

Setting the Stage for Faster, Better Results: What's Needed Now

Create a repository of consensus outcomes and measures, and resources for improvement.

Encourage leadership and collaboration among agencies, levels of governments and sectors.

Build a culture of support for the use of data and outcomes that matter, not punishment and misguided “accountability.”

Develop more accessible, commonly accepted and usable data.

- “80% of data lives in forms and places our teams and systems can’t easily process.”- IBM Watson Team
- World Wide Web founder Tim Berners-Lee: Linked Data

Next Steps: Using Data and Analysis for Faster, Better Results People Care About

Prioritize organizational goals, outcomes and measures from the inventory of options.

- Utilize data and information about the current, projected and comparative performance on these outcomes.
- Involve the public, elected officials, researchers, advocates and practitioners in the prioritization process.

Speed effective implementation with access and use of resources.

- Policy and program research and advocacy
- Promising practices
- Technical assistance and training

Integrate performance assessment and review with strategic planning.

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American Principles Project

Abstract: We urge the Commission to resist calls to repeal the statutory prohibition on the development, implementation, or maintenance of a federal student unit-record system. Such a system would curtail liberty interests of the individual, would invite the collection and use of ever-more data, and would fundamentally alter the relationship between the individual and government in a way that is incompatible with our constitutional republic.

*Statement by Emmett J. McGroarty, JD
Before the Commission on Evidence-Based Policymaking*

The Commission on Evidence-Based Policymaking was created to pursue a laudable goal: To improve analysis of the effectiveness of federal programs.¹ But when such a pursuit is used to justify collecting, conglomerating, and tracking massive amounts of Americans' personal data, as is certainly true in the realm of education, it's necessary to examine the dangers and the tradeoffs. American Principles Project (APP) believes that such activities suppress the liberties of the people and pervert the relationship between the people and government. We urge the Commission to reject calls to establish a federal student unit-record system and to engage in such Orwellian activity.

Section 134 of the Higher Education Act wisely prohibits the development, implementation, or maintenance of a federal student unit-record system (one that would allow the government to collect personally identifiable information (PII) on individual higher-education students and link education data to workforce data).² Recently, though, an orchestrated demand for repeal of this prohibition has been swelling.³

According to well-funded organizations⁴ with a vested interest in accessing that data for their own purposes, the federal government suffers from data-deprivation. Think how much more efficiently our nation could operate, and how much more the government could help people run their own lives, if it maintained a centralized repository tracking almost every conceivable data point about every citizen – where he attended school, what courses he took, what grades he earned, what extracurricular record (good or bad) he compiled, what jobs he applied for, what jobs he got, what salary he made, whether he was promoted, what salary he earned in his new position, whether he lost his job and why, whether he joined the military, what sort of

¹ David B. Muhlhausen, "A Commission for Evidence-Based Policymaking: A Step in the Right Direction," Heritage.org (March 9, 2015), *available at* <http://www.heritage.org/research/reports/2015/03/a-commission-on-evidence-based-policymaking-a-step-in-the-right-direction>.

² 20 U.S.C. sec. 1001 *et seq.*, *available at* http://naicu.edu/docLib/20081030_HEA101-studentunit.pdf.

³ See Libby Nelson, "Idea Whose Time Has Come?" *Inside Higher Education* (May 13, 2013), *available at* <https://www.insidehighered.com/news/2013/05/13/political-winds-shift-federal-unit-records-database-how-much>.

⁴ Kelly Field, "Rescind Ban on Federal Unit-Record System to Track Students, Report Says," *The Chronicle of Higher Education* (March 11, 2014), *available at* <http://www.chronicle.com/article/Rescind-Ban-on-Federal/145279/>.

military record he established, whether he was arrested and for what, whether he went to jail, and on and on *ad infinitum*.

This is not a description of a free and open United States of America. This is a description of a totalitarian society that keeps tabs on its own citizens – for their own good, of course. It’s also a description of what would inevitably happen with the establishment of a student unit-record system, all in the name of “better consumer information,” “accountability,” and “transparency.”

What’s wrong with a federal unit-tracking system?

First, it would compile students’ personally identifiable information (PII) without their consent – or even their knowledge that their data is being collected and disclosed. It’s one thing to collect data from a student who voluntarily (which of course presumes actual notice of the program) participates in a government program and understands that participation will expose his PII to program administrators; it’s quite another to forcibly suck every individual into a data-collection system simply because he enrolled in an institution of higher education. Telling that student that he must hand over his personal data to promote a greater good as defined by bureaucrats and lobbyists – or even worse, just dragooning him without telling him anything – is simply un-American.

Second, the purposes of the proposed system would be so open-ended that the repository is certain to be expanded over time to centralize data far beyond collegiate and employment data. In the creative bureaucratic mind, literally everything can be linked to education. So why stop with employment data? Why not see how one’s education affects his participation in the military? Or his health? Or his criminality? Or his housing patterns? Or the number of children he has? Or whether he purchases a gun? Or his political activity? Inquiring bureaucrats want to know, and every question can be justified by citing “better consumer information.”

And will this dossier created on every citizen become permanent? Presumably so. If the goal of providing maximum consumer information is to be achieved, both historical and current data – constantly updated and expanded – must be compiled and preserved.

Perhaps this expansion won’t happen. Perhaps the federal government, in stark contrast to its behavior over the last 100 years, will stay within its boundaries. But reality-based Americans know the government will push the envelope as far as it possibly can, as it always does. And they know that giving that government access to such a treasure trove of data is dangerous to privacy and to individual liberty.

Third, the idea that this massive repository of PII will be protected against unauthorized access and data breaches is quite simply delusional. Less than a year ago, a hearing of the House Committee on Government Oversight and Reform⁵ revealed the shocking lack of student-data

⁵ U.S. Department of Education: Information Security Review” (Nov. 17, 2015), *available at* <https://oversight.house.gov/hearing/u-s-department-of-education-information-security-review/>.

security throughout the U.S. Department of Education (USED). The problems encompass both lax controls over the people allowed access to sensitive data, as well as outdated technology and inadequate security to prevent unauthorized access.

USED's system contains over 139 million Social Security numbers (largely through its office of Financial Student Aid), along with sensitive borrower information about students and families contained in the National Student Loan Database. The findings of the Office of the Inspector General (OIG) and the General Accounting Office were disturbing:

- Of the 97,000 account/users with access to this information (government employees and contractors), fewer than 20 percent have undergone a background check to receive a security clearance.
- The security mechanisms protecting that data are grossly inadequate. As one OIG witness testified, "During our testing . . . OIG testers were able to gain full access to the Department's network and our access went undetected by Dell [the vendor] and the Department's Office of the Chief Information Officer."
- USED ignored repeated warnings from OIG that its information systems are vulnerable to security threats.

That the federal government should now consider ballooning the sensitive data contained in these insecure systems is at best misguided and reckless.

Even if the data systems were secure, the Obama administration's gutting of the Family Educational Rights and Privacy Act (FERPA) means that government education officials (federal, state, and local) now have enormous leeway to disclose PII on individual students without their consent. Pursuant to the recent FERPA regulations, these officials may share private PII with other government agencies, nonprofit entities, corporations, researchers, and literally anyone on the planet as long as the disclosure can be characterized as an audit or evaluation of a (broadly defined) "education program."⁶

Will the new conglomeration of student data be fair game for disclosure under these regulations? The danger is too real to dismiss.

The philosophical problem with a federal student unit-record system is that it treats free-born American citizens as objects of research and study. It assumes that the goal of benefitting others in society, in vague and theoretical ways, authorizes the powerful federal government to collect and disseminate millions of data points on individuals – without their consent. This fundamentally changes the relationship between the individual and government. Collecting and holding massive amounts of data about an individual has an intimidating effect on the individual—even if the data is never used. This is even more so the case when the collector has

⁶ Letter from American Association of Collegiate Registrars and Admissions Officers to Regina Miles of U.S. Dept. of Education (May 23, 2011), *available at* https://aacrao-web.s3.amazonaws.com/migrated/FERPA-AACRAO-Comments.sflb.ashx_520501ad842930.77008351.ashx.

the force of the law behind it. Our republic rests on the idea that the citizen will direct government. That cannot happen where government sits in a position of intimidation over the individual.

Submitted by:

Emmett J. McGroarty, Esq.
Senior Fellow
American Principles Project

Commission on Evidenced-Based Policymaking
Submission by
Carrie Wofford, President, Veterans Education Success &
Mark Schneider, Vice President, American Institutes for Research

The Need to Share and Link Federal Data on the Post-9/11 GI Bill

We urge the Evidence Based Policymaking Commission to take steps to end the siloization of federal data and ensure that federal agencies share data.

The Post-9/11 GI Bill provides an important example of the detrimental impact of siloed federal data.

Why it Matters:

Historians and economists frequently credit the original GI Bill with helping to build America's Middle Class following WWII. After the 9/11 terror attacks on American soil, a new GI Bill was enacted to provide the current generation of veterans with their ticket to the American dream, helping 1.5 million veterans at a cost to taxpayers of \$61 billion since August of 2009. The goal is to assist veterans in the transition to a successful civilian career.

In order to best serve veterans and the federal taxpayer investment, government officials, higher education leaders, and policymakers need to know how the GI Bill is succeeding and "what works" under the GI Bill.

Such an assessment is impossible because federal data regarding student outcomes and occupational outcomes for veterans remain siloed across several federal agencies.

At this time, nobody in America knows the student veteran graduation rate, debt rate, default rate, or whether the Post-9/11 GI Bill is succeeding in supporting veterans' transition to civilian occupational and income success. Little is known about veterans' educational attainment, debt or default, because the U.S. Education Department (ED) does not know which students are veterans and the U.S. Department of Veterans Affairs (VA) does not track student outcomes. Although ED formerly tracked veterans in its database, it stopped doing so in 2009, when it introduced a skip-pattern in its FAFSA form, such that most veterans never seeing the question about military service. Unfortunately, this change at ED was launched the exact same year (2009) that the Post-9/11 GI Bill went into effect. A 2014 U.S. Senate Committee reported that for-profit colleges dominate the Post-9/11 GI Bill and generally provide poor outcomes for students overall, while costing taxpayers twice as much per veteran as public colleges and universities, but student outcomes specific to veterans was unknown. Indeed, reporters asked the Senate Committee what the student veteran graduation rate was, and this question was

impossible to answer because the data needed to answer this basic question is held in separate agencies.¹

In addition, occupation and income data from IRS and Census is not linked to either VA or ED data.

What Data-Linking or Sharing Could Achieve:

If data from VA and ED were shared or cross-walked and if occupational and income data from IRS or Census were added, the resulting combined data set would provide solid answers on the student veteran graduation rate, debt and default rates, job placement rate, and income. The shared data would:

Help veterans make an informed college choice as they decide where to use their GI Bill by arming them with data about veterans' probability of graduation and likely earnings trajectory from each college (and each program). VA's GI Bill College Comparison Tool is currently the best source of information for veterans choosing a college, but it does not provide veteran-specific data. If federal data were shared, VA's GI Bill College Comparison Tool could be as robust as ED's College Scorecard. The College Scorecard was possible only because federal agencies shared data. The College Scorecard provides students with important data-points about student graduation (specifically, the graduation rate within 150% of expected time to completion for first-time, full-time students) and salary after attending (specifically, the median earnings of former students who received federal financial aid 10 years after entering the school). It should be noted that much of ED's data is limited to first-time, full-time students, which is an outdated limitation and one the Commission should urge ED to change.

Help Congress and policymakers improve regulation by providing data on Post-9/11 GI Bill students and their debt and occupational rates. Currently, Congress and policymakers have no data on the student outcomes, nor on the occupational and income outcomes, of educational paths under the Post-9/11 GI Bill. Understanding a return on investment would assist

¹ Private efforts have tried to determine the student veteran graduation rate, but it is impossible without VA and ED actually sharing data. The largest private effort (by Student Veterans of America, known as the 2014 "Million Records Project" and its 2016 update "NVEST") undertook to match VA data on Post-9/11 GI Bill use against data from the National Student Clearinghouse to try to determine the student veteran graduation rate for a subset of GI Bill users. But the Clearinghouse data is limited to degree-granting schools (and covers most, but not all veterans at degree-granting schools), so it provides only a limited answer. Most notably, Clearinghouse does not track students at certificate, non-degree programs, nor vocational/technical programs (both of which are covered under the GI Bill). VA estimates that nearly half of the GI Bill is spent at non-degree schools, meaning that the Clearinghouse data and the "Million Records Project" are missing half of GI Bill students. Specifically, VA reports that among Post-9/11 GI Bill students starting their education in 2015: some 54,000 Post-9/11 GI Bill students were starting non-degree college programs, and 30,000 started vocational and technical programs, while 87,275 started undergraduate degree programs and 19,222 started graduate degree programs.

policymakers greatly, but requires federal data matches. Data-linkage would enable exploration of the effectiveness of the Post-9/11 GI Bill in ensuring a successful civilian career for the current generation of veterans. Adding in data from the U.S. Defense Department's test scores on service members' abilities and skills could serve as "controls" in determining the impact of the GI Bill.

Executive Order 13607 (April 27, 2012) required VA and ED to share data to determine veteran student outcome measures, but, four and a half years later, the agencies still have not completed an MOU to do so.

Detailed Questions That Could Be Answered if Federal Data Were Combined:

1. **Participation in the Post-9/11 GI Bill:**

- a. **Nearly half of the Post-9/11 GI Bill goes unclaimed.** What are the demographics of veterans who skip the GI Bill? How are they faring? What are their occupations and incomes, and how do those compare to their occupations and incomes prior to military service? Are they reliant on public assistance? Did they skip the GI Bill because they already had a college degree, or because they had a strong career before military service? By historic contrast, only 20% of eligible veterans skipped the original GI Bill following WWII, and such eligible non-participants were often older (over the age of 35).² In terms of occupation prior to military service, most veterans who utilized the original GI Bill after WWII had "little or no pre-war experience in jobs requiring extensive skill or training," while those who skipped it (eligible non-participants) had been "working in jobs of a fairly high level" before the war.³ Are these trends true today under the Post-9/11 GI Bill? Veterans organizations report anecdotal evidence that many veterans skipping today's GI Bill do need higher education but feel intimidated by the college search process and fear their academic skills are not up to par.

² The President's Commission on Veterans' Pensions, *Veterans Benefits in the United States* (April 1954), Omar Bradley, Chairman (known popularly as the "Bradley Commission"), available at http://www.cnas.org/sites/default/files/Bradley_Commission_Report1956.pdf (page 251, 259). The Bradley Commission found that 83-86% of veterans in the two youngest groups (under 20 or between 20-24 years of age) used the GI Bill.

³ Bradley Commission, available at http://www.cnas.org/sites/default/files/Bradley_Commission_Report1956.pdf (page 261). The Bradley Commission also reported that many of the younger veterans "had held no regular job before entering service. In general, those who had held jobs were in relatively unskilled occupations." (page 258). In contrast, only 30% of pre-war managers and proprietors used the original GI Bill, as did only 39% of pre-war full-time employees. (page 261)

- b. **Participation under the Post-9/11 GI Bill is increasing each year.** VA data shows that nearly 1 million eligible individuals participated in 2011, a 15% increase over FY 2010 and a 71% increase over FY 2009. Do the data show better student outcomes (such as persistence and completion) and civilian employment success among more recent GI Bill students as compared to 2009 and 2010? Are student loan debt and default levels rising? Has the return on taxpayer investment changed over time?
 - c. **Non-Veteran vs. Veteran Participants.** Veterans can choose to give some or all of their Post-9/11 GI Bill to their spouse or dependents, and 18% of GI Bill students are spouses or dependents. Do non-veteran GI Bill students enjoy better outcomes than veterans? Do they have better persistence and completion rates in college, perhaps indicating that veteran students need more support on campus? How do non-veteran Post-9/11 GI Bill students' loan debt and default rates compare to their veteran counterparts? Do non-veteran participants have higher incomes and better correlation between their occupation and field of degree?
 - d. **Outcomes by Demographics.** Are there differences by age, race, gender, ethnicity, or residential region in outcomes for Post-9/11 GI Bill users? For example, some VA analyses suggest that women veterans are more likely to use the Post-9/11 GI Bill than men. Is their persistence better? Are their outcomes better?
2. **GI Bill Effectiveness.** How effective is the Post-9/11 GI Bill in ensuring a successful civilian career for the current generation of veterans?
- a. **Income & Public Assistance.** Do veterans have higher incomes and less dependence on public assistance programs after using the Post-9/11 GI Bill than before they used it? By point of comparison, the original GI Bill, following WWII, reportedly reduced reliance on unemployment assistance from 20% of veterans.⁴ What is known about veterans who rely on public assistance programs? How many have a college degree, whether through the Post-9/11 GI Bill or otherwise? What was their field of study in college? What is their occupation?
 - b. **Degree and Occupation.** Do veterans have different occupations after using the Post-9/11 GI Bill than before they used it? Among Post-9/11 GI Bill users, which occupations, degrees, and fields of study result in the highest income and least reliance on public assistance? Do the degrees and occupations correlate, or is occupational success (at least in some occupations) independent of degree

⁴ Bradley Commission, *available at*

http://www.cnas.org/sites/default/files/Bradley_Commission_Report1956.pdf (page 251).

obtained? What about licensed occupations? Does the GI Bill help veterans obtain work in licensed occupations? (Approximately 20% of a sample of 300 degree programs approved by VA for Post-9/11 GI Bill in licensed occupations are improperly accredited and fail to leave the graduates eligible to work.⁵ What percent of veterans working in licensed occupations used the Post-9/11 GI Bill in that field of study? Are public colleges more likely to have the right accreditation for graduates to be eligible to work in licensed fields?) Which degrees and institution types produce graduates employed in which fields, with which licenses?

- c. **Debt and Default:** What are the student loan debt and default rates for both veteran and non-veteran beneficiaries using the Post-9/11 GI Bill? Are debt and default rates higher for veterans than non-veteran students using the Post-9/11 GI Bill? Are there correlations in student loan debt and default by degree and field of study obtained? By college type (online vs. brick and mortar) and institutional sector? By occupation and income?
 - d. **Montgomery GI Bill vs. Post-9/11 GI Bill:** Does the Post-9/11 GI Bill deliver better return on investment, including student and occupational outcomes, than its immediate predecessor, the Montgomery GI Bill?
3. **Which College Experience Yields the Best Return on Investment under the Post-9/11 GI Bill?**
- a. **Brick and Mortar vs. Online.** Among Post-9/11 GI Bill users, what type of college is most effective? Many experts assume brick and mortar colleges are more effective than online education, but online education is very popular with military students. What are the educational outcomes and civilian employment success for online student veterans?
 - b. **Institutional Sector.** Among Post-9/11 GI Bill users, which sector of college is associated with the best student outcomes and civilian employment success: public, non-profit, or for-profit? What is the return on investment from each sector?

⁵ See Veterans Education Success, “The GI Bill Pays for Degrees That Do Not Lead to a Job,” (Sept. 2015) *available at*

<http://static1.squarespace.com/static/556718b2e4b02e470eb1b186/t/56ba65f8356fb040f04fb56a/1455056377419/GI+Bill+Dollars+do+not+pay+for+accredited+programs.pdf>

- i. Several government⁶ and private reports⁷ have concluded that **for-profit colleges** do not serve students well. Do for-profit colleges have lower persistence and completion rates among Post-9/11 GI Bill students than other sectors? Do for-profit colleges produce higher student loan debt levels and default rates? What are the civilian employment results for Post-9/11 GI Bill graduates? Also, what is the return on investment?
 - ii. Experts often claim **public community colleges** produce better results for veterans, and significant public and private funds are invested in community college programs for veterans. What are the student outcomes and civilian employment success of veterans at community colleges compared to other sectors? What is the return on investment for veterans at community colleges?
- c. **Specific Colleges:** Because much of the Post-9/11 GI Bill expenditures are concentrated in a handful of colleges, it is possible to derive robust samples at those colleges, enabling an assessment of how well the colleges are serving veterans and the taxpayer investment.
 - d. **Type of Degree:** Are there differences in the return on investment among GI Bill students attending college degree programs (e.g., Bachelor of Science in Engineering) vs. non-degree, certificate programs (e.g., Certificate in Radiology Technology) vs. vocational/technical programs (e.g., truck driving) – taking into account the cost of the program and the resulting civilian success? (Defense Department scores of service members’ skills and abilities could serve as a control when measuring post-education occupational success.) Do demographic or household income correlate with type of degree chosen?
 - e. **Field of Study:** Is it possible to determine program-specific outcomes, such as the return on investment of a B.S. in Engineering vs. a B.S. in Nursing, factoring in demographic and pre-education differences?

We hope the Evidence Based Policymaking Commission can take strong steps to end the siloization of federal data and ensure that federal agencies share data to benefit the public as well as policymakers.

⁶ See, e.g., U.S. Senate Committee 2012 report, “For-Profit Education: The Failure to Safeguard the Federal Investment and Ensure Student Success,” available at http://www.help.senate.gov/imo/media/for_profit_report/PartI.pdf

⁷ See, e.g., National Bureau of Economic Research, “Evaluating Student Outcomes at For-Profit Colleges,” (June 2012), available at <http://www.nber.org/papers/w18201>

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Request for Comments for the Commission on Evidence-Based Policymaking

Comment On: USBC-2016-0003-0001

Request for Comments for the Commission on Evidence-Based Policymaking

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Comment on FR Doc # 2016-22002

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General Comment

Dear Commission on Evidence-Based Policymaking,

I love the American concept of voter-based, Constitution-based, elected representative-based, policymaking. It's why I live in America. In contrast to voter-based policymaking there is evidence-based policymaking, which I don't love because it implies that one entity's "evidence" trumps individuals' consent to new policy changes.

Former Secretary of Agriculture Ezra Taft Benson said something about education that also applies to educational data and policymaking:

"The best way to prevent a political faction or any small group of people from capturing control of the nation's educational system is to keep it decentralized into small local units... This may not be as efficient as one giant super educational system (although bigness is not necessarily efficient, either) but it is far more safe. There are other factors, too, in favor of local and independent school systems. First, they are more responsive to the needs and wishes of the parents and the community. The door to the school superintendent's office is usually open to any parent [or teacher]... But the average citizen would be hard pressed to obtain more than a form

letter reply from the national Commissioner of Education in Washington, D.C."

Local control, and consent of the governed, are two foundational principles in our great nation.

Because the CEP is not an elected body, it does not hold authority to collect, or to recommend collection, of student-level evidence, or of any evidence, without written consent; and, for the same reasons, neither does the Department of Education.

Because the fifty, federally-designed, evidence-collecting, State Longitudinal Database Systems never received any consent from the governed in any state to collect data on individuals (as the systems were put into place not by authority, but by grant money) it follows that the idea of having CEP study the possible removal of barriers to federal access of those databases, is an egregious overstep that even exceeds the overstep of the State Longitudinal Database Systems.

Because federal FERPA regulations altered the original protective intent of FERPA, and removed the mandate that governments must get parental (or adult student) consent for any use of student level data, it seems that the idea of having CEP study and possible influence removal of additional "barriers" to federal use of data, is another egregious overstep.

As a licensed teacher in the State of Utah; as co-founder of Utahns Against Common Core (UACC); as a mother of children who currently attend public, private and home schools; as acting president of the Utah Chapter of United States Parents Involved in Education (USPIE); as a patriot who believes in "consent of the governed" and in the principles of the U.S. Constitution; and, as a current tenth grade English teacher, I feel that my letter represents the will of many who stand opposed to the study of the removal of protective barriers on student-level data, which the CEP's website has outlined it will do.

I urge this commission to use its power to strengthen local control of data, meaning parental and teacher stewardship over student data, instead of aiming to broaden the numbers of people with access to personally identifiable student information to include government agencies and/or educational sales/research corporations such as Pearson, Microsoft, or the American Institutes for Research.

To remove barriers to federal access of student-level data only makes sense to a socialist who agrees with the Marc Tucker/Hillary Clinton 1998 vision of a cradle-to-grave nanny state with "large scale data management systems" that dismiss privacy as a relic in subservience to modern government. It does not make sense to those who cherish local control.

It is clear that there is a strong debate about local control and about consent of the governed, concerning data and concerning education in general. NCEE Chair Mark Tucker articulated one side of the debate when he said: "the United States will have to largely abandon the beloved emblem of American education: local control. If the goal is to greatly increase the capacity and authority of the state education agencies, much of the new authority will have to come at the expense of local control."

Does that statement match the philosophical stand of this commission? I hope not. Local control means individual control of one's own life. How would an individual control his or her own destiny if "large scale data management systems" in a cradle-to-grave system, like the one that Tucker and Clinton envisioned, override the right to personal privacy and local control? It is not possible.

I urge this commission to use any influence that it has to promote safekeeping of unit-record data at the parental and teacher level, where that authority rightly belongs.

Sincerely,

Christel Swasey

United States Parents Involved in Education (USPIE) is a nonprofit, nonpartisan, nationwide coalition of state leaders focused on restoring local control of education by eradicating federal intrusion. State leaders from around the country fed up with being ignored on education policy have joined forces to abolish the US Education Department and put an end to all federal education mandates.

USPIE endeavors to inform Americans of the trillions of dollars wasted on federal education in the last 35 years with nothing to show for it but stagnant, and declining test scores. It is the goal of USPIE to return American's education to its proper local roots and restore parental authority over their children's education.

USPIE's STOP FED ED campaign is led by parents, taxpayers and educators committed to ending the U.S. Department of Education. The fight against Common Core has exposed the failures of those trying to force a federally-based one size fits all curriculum on states and local school districts.

So we ask, "why even have a federal department?" Because it's not about children. It's about control. Control through federal dollars. And it's big business. It's about pushing an agenda. And it's about ending something that had worked for years and replacing it with something no one even understands.

For half a century now this experiment with federal control of local public schools has gone on and it's failed. Let's stop treating our children like rats in some social engineering laboratory and start treating children like children again. The first step is ending the Department of Education and that's what STOP FED ED is all about.

H1_2016_14

October 21, 2016 Hearing

United States Parents Involved in Education

Presenter: Erin Knowles

Note: Erin Knowles was unable to be present, but submitted written remarks.

**Commission on Evidence-Based Policymaking (CEP)
First Public Hearing: Friday, October 21, 2016**

Comments Submitted by

Christine M Keller, PhD
Association of Public & Land-grant Universities (APLU)
Vice President, Research and Policy Analysis
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Abstract: *The most significant barrier for evidence-based policymaking and decisions within higher education is the ban within the Higher Education Opportunity Act of 2008 that prohibits the Department of Education from collecting student-level data for postsecondary students. The lack of national student-level data prevents the Department from calculating comprehensive progress and completion outcomes for students as they move across different higher education institutions, especially as they cross state boundaries. It also prevents the linking of postsecondary data with federal data from other agencies that would allow better evidence of outcomes after college (e.g., earnings, employment) as well as outcomes for students in key federally-funded programs (e.g., Pell grants, veterans benefits). The result is that students and families are left in the dark as they make the critical decision of which college or university is the right fit; policymakers struggle to appropriately hold accountable institutions receiving taxpayer dollars; and institutions lack the information they need to assess their performance and improve.*

Oral and Written Statement

Co-chairs Abraham and Haskins and distinguished members of the Commission, thank you for the opportunity to submit comments for your consideration during this hearing. My name is Christine Keller and I am the Vice President of Research and Policy Analysis at the Association of Public and Land-grant Universities (APLU). APLU is a research, policy, and advocacy organization dedicated to strengthening and advancing the work of public universities in North America.

A top priority for APLU is to foster the widespread use of data and evidence to support decision-making - on university campuses and as the basis for sound and effective federal policy. APLU believes the most significant barrier for evidence-based policymaking and decisions within higher education is the ban that prohibits the Department of Education from collecting individual-level data for postsecondary students (Higher Education Opportunity Act of 2008). Lifting the ban in order to create a limited federal postsecondary student-level data system would produce more accurate details of student enrollment patterns, progression, completion, and post-collegiate outcomes. Such a system would assist with national priorities such as providing students and their families with more complete and accurate information when selecting a college. And better ensure that policymakers can appropriately allocate public resources and evaluate program effectiveness.

A student-level postsecondary data system would address one of the most significant shortfalls of the current institution-level data collections within the Department of Education – the inability to accurately report the

progress and completion of all students across multiple institutions and state boundaries. The current federal graduation rate only reports the completion of full-time students who start and finish at their first institution. Students who start their studies part-time or transfer institutions are not reported in the federal rate. Data from the National Student Clearinghouse demonstrate that these students comprise an increasingly large proportion of today's students. Sixty-four (64) percent of bachelor's degree recipients from public universities attend more than one institution before graduation and more than 60 percent of community college students attend part-time. Yet these students are missing from the federal graduation rate.

The Department of Education, to its credit, has made multiple attempts to address these shortcoming within the constraints of an institutional level collection. However, the information provided remains inadequate for consumers and policymakers, adds reporting burden for institutions, and, the latest attempt was judged too unreliable by the Department of Education to release the data publicly after the first year of collection. A student-level data collection would simplify the creation of progress and outcomes measures as well as increase reliability and consistency of the metrics across institutions.

A second significant shortfall of the current postsecondary data is the inability to create linkages between postsecondary education data and other federal data systems. Linking with other federal data systems would harness the data already collected through other agencies to provide key information such as employment and earnings after college for all students. Progress and completion rates could be reliably and accurately calculated for student participating in federal programs such as Pell grants or GI Benefits. Combining information across federal agencies would streamline data collection, minimize duplicate reporting by institutions, and reduce the chance of errors in the resulting metrics.

Any student-level data system must include a robust set of protections and protocols to safeguard student data from unauthorized use or disclosures and to secure its collection and storage. Policies and procedures to protect data must be transparent and utilize evolving best practices for data security to address real and legitimate concerns about privacy and security, but privacy and security should not be used as an excuse for blocking transparency and access to more complete data.

Following are two specific examples from APLU members that illustrate why lifting the ban to create a system with more comprehensive and accurate data is a top priority for our association.

Example 1: Student Achievement Measure

As I mentioned earlier, the current federal graduation rate only includes first-time, full-time students who start and finish at their first institution. To help fill the data gaps in the federal system, the higher education community created **the Student Achievement Measure** (www.studentachievementmeasure.org) or SAM. SAM is a voluntary initiative that allows institutions to report the progress and completion of full-time, part-time, and transfer students. Over 600 colleges and universities from all 50 states and the District of Columbia are participating in SAM and reporting the outcomes of 600,000 more students than the federal government's measure.

One of the SAM participants is the University of North Texas. The federal graduation rate for UNT shows that just under half of first-time, full-time student who started in Fall 2009 graduated within 6 years. With only the information provided by the federal graduation rate, it appears that the other half of the students who started at the University of North Texas failed. However, by using the SAM methodology, UNT is able to show that another 13% of students graduated from another institution and another 14% are still enrolled pursuing their degree, for a total of 76% students who have graduated or are still enrolled.

SAM also reports the outcomes for the nearly 3,000 students who started at the University of North Texas as transfer students in Fall 2009 and are missing from the federal **rate** – 80% have graduated or are still enrolled after 6 years. All totaled, SAM includes another 3,000 of the University of North Texas’s students who are not included in federal graduation rate.

SAM provides a powerful model of the type of information that would be available if the ban on collection of student-level data were lifted. However, SAM is not a substitute for a federal student-level data system. SAM is voluntary and does not include all postsecondary institutions. Nor is SAM the official data included in the U.S. Department of Education’s College Scorecard, the U.S. Department of Veterans Affairs’ college comparison tool, or other consumer information tools. A more complete federal solution is still needed.

Example #2: University of Texas System

A second example comes from the University of Texas System. The UT System has demonstrated the usefulness of student-level data as part of their consumer information tool – seekUT (<http://utsystem.edu/seekut/>). By combining student-level data and the state workforce data, the UT System is able to present information such as the average cumulative student loan debt and median earnings at one, five, and ten years post-graduation for students graduating from specific programs at the UT institutions.

However, as useful and powerful as having earnings data at the state level has been, there were key limitations that hindered the UT System’s ability to answer critical questions. Without a federal postsecondary data solution they were limited to data for those graduates that remained in Texas after graduation and unable to account for the earnings of graduates that move out of state. UT System administrators recognized that they needed national data across all states to evaluate and improve academic programs. And provide students with more comprehensive employment and earnings information to show a realistic picture of earnings after graduation. This information would help students make more informed decisions about their choice of majors and appropriate amounts of debt.

In fact, the UT System felt that national employment and earnings data would be of such high value that they recently finalized an agreement with the US Census Bureau to provide national post-college outcomes for UT graduates through a pilot research project. The Census-UT System collaboration is an important demonstration of how higher education and federal agencies can break down silos and work together. Imagine how valuable would it be if all colleges and universities and state systems could have access to similar information to support institutional evaluation and improvement and student decision-making – without each entity negotiating a separate agreement? A national student-level data system could help all institutions more readily reach that goal.

In sum, lifting the ban on the collection of student-level postsecondary data would provide access to more comprehensive, meaningful data and allow for the better alignment and integration with other federal data systems. The results would strengthen the federal government’s ability to provide essential information on higher education – for student and families to make more informed decisions about where to attend college; for policymakers to determine allocations of public resources and evaluate program effectiveness; and for college leaders to develop institutional policies and practices that support successful outcomes for all students.

As the Commission continues to develop a strategy for increasing the availability, alignment, and use of high quality data to inform policy and decision-making, we encourage your consideration of the acute need for more accurate and complete postsecondary data for all users.

APLU is a research, policy, and advocacy organization dedicated to strengthening and advancing the work of public universities in the U.S., Canada, and Mexico. With a membership of 236 public research universities, land-grant institutions, state university systems, and affiliated organizations, APLU's agenda is built on the three pillars of increasing degree completion and academic success, advancing scientific research, and expanding engagement. Annually, its 194 U.S. member campuses enroll 3.9 million undergraduates and 1.2 million graduate students, award 1 million degrees, employ 1 million faculty and staff, and conduct \$40.2 billion in university-based research.



Commission for Evidence-Based Policymaking Public Hearing: Remarks from the American Statistical Association's Scientific and Public Affairs Advisory Committee

October 21, 2016

My name is Clyde Tucker and I am a member and former chair of the American Statistical Association's Scientific and Public Affairs Advisory Committee. The American Statistical Association was founded in 1839 and is the oldest continuously operating scientific society in the United States. With more than 19,000 members working in academia, government, and industry, the ASA works to promote the practice and profession of statistics, the science of learning from data, and measuring, understanding, and communicating its uncertainty. We believe that statistics and the ability to interpret statistical evidence are integral to the success of evidence-based policy making.

The ASA lauds Speaker Ryan and Senator Murray for their actions and efforts to bring evidence-based policymaking into the limelight. The ASA heartily supports the Commission for Evidence-Based Policymaking and looks forward to the Commission's efforts to improve the science surrounding evidence-based policymaking. We appreciate that three Commissioners are members of the ASA, two of which are former heads of federal statistical agencies. In my brief comments today, I will focus on five issues: (i) the stature and autonomy of the federal statistical system; (ii) data sharing that leads to data synchronization; (iii) concerns related to privacy and confidentiality that may present barriers to the release of data needed for evidence-based policy making; (iv) nurturing evidence-based policymaking capacity across the federal government; and (v) statistical evidence.

To ensure that the statistical analysis used to support evidence-based policy making is both impartial and accurate, the integrity of the research process must be maintained. In particular, the ASA believes that the federal statistical agencies will play a vital role in evidence-based policymaking, and ASA is committed to supporting the historical autonomy of these agencies in order to ensure the integrity of their work. In a 2015 letter to Congress, twenty former statistical agency heads wrote,

As the foundation for policy making and policy administration, objective and credible statistical data are vital to our democracy, economy, governance, and well-being. All sides of a policy debate should be able to look to the statistical data as objective and high quality. Any perception that the data have been influenced by a partisan perspective undermines the policy making and its administration. The independence of a federal statistical agency is a critical element in an agency producing objective and credible statistical data... Statistical agencies should have complete control over data collection, analysis, and publication. Such autonomy

should include control over an agency's planning, budget, press releases, and information technology.

In the past, this independence for some agencies has been protected from direct political interference by requiring that the heads of statistical agencies be appointed by the President and confirmed by the Senate. Currently, however, Senate confirmation is no longer required to appoint the director of the Bureau of Justice Statistics or the commissioner of the National Center for Education Statistics (NCES). There is also a House-passed bill pending in the Senate that would remove presidential appointment of the NCES Commissioner.

The ASA also supports data linkage and collaboration between the federal statistical agencies. Indeed, greater information sharing across agencies would enhance the research supporting evidence-based policymaking. One example of this type of data sharing is data synchronization. For example, ASA advocates, as a follow up to the Confidential Information Protection and Statistical Efficiency Act (CIPSEA), providing the Bureau of Labor Statistics and the Bureau of Economic Analysis the same access to the Internal Revenue Service's business information that the Census Bureau currently has. Supported not just by ASA but also by a wide variety of other stakeholders, this carefully crafted proposal costs no money, but would result in substantial improvements to the quality of our nation's official economic statistical data, ultimately benefitting policymakers, US businesses, and many other Americans. For more information on this, I provide links to three resources at the end of my written comments that I understand you will have access to.

Although privacy and confidentiality are important concerns with respect to the release of data for research purposes, barriers created to ensure privacy and confidentiality could limit analysis critical for evidence-based policymaking. In particular, researcher's access to data often is delayed as a result of the need to undergo reviews by multiple Institutional Review Boards (IRBs). This process can impede the ability to respond quickly to the needs of policymakers. I have provided a link to a new National Academies report that notes the delays caused by the multiple IRB approvals sometimes needed for a single study and the serious problems this creates for timely policymaking.

While perhaps beyond the charge of this committee, ASA also encourages more resources for federal agencies to develop their internal capacities for evidence-based policymaking. Although the statistical agencies have statistical expertise needed for evidence-based policymaking, a number of agencies do not. More could be done to increase this analytical capacity across the government. Given the constrained budgets of the federal government, we understand adding personnel with appropriate expertise isn't widely feasible. However, we strongly encourage alternative solutions, such as guidance documents and professional development on this topic. In fact, staff at the statistical agencies might be involved in these endeavors. We would also support greater agency collaboration through reduced barriers and greater access to data for trusted and vetted users in ways that ensure confidentiality protection.

Let me close with comments on statistical evidence for the wider evidence-based policymaking community. We encourage the use of modern statistical and data science methods in program evaluations—methods such as Bayesian modeling, decision analysis, and big data techniques. To put our comments in context, we recently saw statistical language in pending legislation that seemed artificially restrictive. Specifically, we were concerned that the language might limit analysis to significance testing or p-values alone.

The ASA Scientific and Public Affairs Advisory Committee recently released a statement with guidance on statistical language in legislation, http://ww2.amstat.org/misc/SPAAC_GuidanceStatisticalEvidence.pdf. We look forward to continued conversation on this issue.

To reiterate, we fully support the Commission on Evidence-Based Policymaking and look forward to engaging the statistical community in your efforts. Thank you for your time.

Links for 2015 letter to Congress from twenty former statistical agency heads:

- <http://ww2.amstat.org/misc/FormerAgencyHeadLetter.pdf>
- <http://community.amstat.org/blogs/steve-pierson/2015/01/29/former-federal-statistical-agency-heads-urge-stronger-nces-as-senate-panel-advances-bill-to-weaken-it>

References on Data Synchronization

- <http://www.aei.org/publication/data-asymmetry-public-policy/>
- <http://www.copafs.org/UserFiles/file/FederalBusinessRegistryLetterSenatewithAttach.pdf>
- <http://magazine.amstat.org/blog/2011/11/01/data-synchronizationscipolicy/>

Reference to the National Academies report on multiple IRB approvals

- <https://www.nap.edu/catalog/23670/strengthening-data-science-methods-for-department-of-defense-personnel-and-readiness-missions>