

M-20-12 Frequently Asked Questions

Phase 4 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Program Evaluation Standards and Practices

The Office of Management and Budget (OMB) Memorandum [M-20-12](#), “Phase 4 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Program Evaluation Standards and Practices,” provides program evaluation standards to guide agencies in developing and implementing evaluation activities, evaluation policies, and in hiring and retaining qualified staff. This FAQ provides supporting discussion based on common questions. If you have additional questions, please reach out to the OMB Evidence Team, evidence@omb.eop.gov.

Q: I work in a sub-agency, bureau, or division of an agency. Does this guidance apply?

Yes, the standards outlined in OMB M-20-12 apply to all evaluation activities undertaken in the Federal government. Some agencies have a separate evaluation office, while other agencies have staff members who work on evaluation within a program office or among performance staff. All evaluation activities should adhere to the standards regardless of organizational structure.

Q: Will OMB be issuing more resources related to these standards and practices?

Section 290 in [OMB Circular A-11](#) provides an important resource for Evaluation Officers and others working on evaluation and the Evidence Act deliverables. OMB updates Circular A-11 each year, and this section is being further expanded to include additional clarifications and information about the Evidence Act and associated agency processes and deliverables. Updated text for A-11 will be issued in Summer 2020.

Through the OMB Evidence and Evaluation Community of Practice, the Evaluation Officer Council, and associated interagency workgroups, there will be a continued effort to develop other resources and tools to support agencies as they implement the Evidence Act and improve their capacity to do high-quality program evaluation and evidence-building activities.

Q: Our office is new to conducting evaluations and finds this guidance a bit daunting. Where should we start?

For those new to conducting program evaluation, the guidance provides a foundation on which to build your team, your evaluation policy, and your approach to carrying out evaluation work. The standards and practices also provide a framework for learning and collaboration with evaluation counterparts across the government and a common language to discuss evaluation principles.

Q: What is the difference between an agency’s evaluation policy and a learning agenda?

An agency’s evaluation policy should be guided by the standards in OMB M-20-12. The evaluation policy is a lasting, long-term document that can be updated over time as appropriate. It does not have a set end date or cover a specific period of time. In contrast, a learning agenda is a multi-year document that is updated regularly. It is a systematic plan for identifying and addressing policy questions relevant to the agency; the data agencies intend to collect, use, or acquire; and the methods and analytical approaches for addressing the questions. More information can be found in OMB [M-19-23](#) and OMB Circular A-11.

Q: Are agencies with evaluation policies in place expected to make changes to align with the standards in OMB M-20-12?

The Evidence Act and OMB M-19-23 lay out the responsibility of an agency’s Evaluation Officer to create and implement an agency-wide evaluation policy. The contents of that evaluation policy should be guided by and adhere to the standards articulated in OMB M-20-12. Agencies with existing evaluation policies should use the issuance of OMB M-20-12 as an opportunity to review and revisit their existing policy.

To date, most CFO Act agencies do not have an agency-wide evaluation policy and can use the standards in OMB M-20-12, as well as existing policies in their sub-agencies, bureaus, and divisions, to guide development of the agency-wide policy. An agency-wide policy does not supersede and should not create administrative rigidity for the functions of sub-agencies, bureaus, and divisions as they carry out their own evaluation activities. It is important to note that OMB does not expect (nor would OMB necessarily want to see) a verbatim copy-paste of OMB M-20-12 as an agency’s evaluation policy.

Q: How are agencies applying the standards identified in OMB M-20-12 to other evidence gathering activities that are not program evaluations?

While the standards in OMB M-20-12 should be applied to all evaluation activities, many are applicable to other evidence-building activities. For example, the standard of rigor would apply to other statistical activities and data analysis an agency may undertake. Relevance and utility are applicable to most evidence-building activities, including decisions on administrative data reporting and policy-oriented data analysis or modeling. However, not all of the standards will apply to all kinds of data analysis that agencies do. For example, the standard of independence may not apply in all cases for analyses that require working directly with policy officials, or where economists and statisticians are running data models for immediate policy decisions.

Q: My agency’s mission focuses mostly on regulations. How does this apply to us?

The Evidence Act specifically calls on agencies to look at regulations and regulatory activity when thinking about priority questions for their learning agenda, and the Annual Evaluation Plan is meant to cover the significant evaluations an agency plans to undertake. In a regulatory-heavy agency, it is expected that the evaluations conducted would include some that relate to regulations or regulatory activities. In those cases, the evaluation standards and practices should be applied.

Q: I work in the Office of the Inspector General (OIG). How does this apply to our work?

Inspectors General play a critical role in agency oversight and accountability but they are auditing or evaluating for a different purpose than program evaluations. In contrast to the oversight and accountability role of OIGs, the evaluations addressed in OMB M-20-12 and in OMB M-19-23 are conducted to answer questions about program effectiveness for the purposes of program improvement. If an OIG undertakes a formal program evaluation, these standards and practices should guide that work to the extent practicable to ensure credibility of the findings.

Note: OMB M-19-23 explains that the Evaluation Officer cannot be a member of the Inspector General's staff or located in the Inspector General's (IG) office; the Evaluation Officer required by the Evidence Act has a different function than that of an IG.

Q: What kinds of questions can outcome evaluations answer? How does this relate to analysis of performance outcomes?

Outcome evaluations measure the extent to which a program, policy, or organization has achieved its intended outcome(s). Measures of outcomes, or performance outcomes, are used in many types of evaluations. What is important is the study design and methods used. Outcome evaluations cannot show whether the change observed is due to the program intervention or something else. An outcome evaluation alone does not include a counterfactual, and thus is not able to demonstrate the impact or change that occurred because of that specific intervention, program, etc.

For example, if participants in a reading education program improved their scores on a reading test by five points, on average, after one month of the program, then their “outcome” (i.e., score on the reading test) or performance has improved by five points. However, there may be one or more reasons why the reading score is higher after one month. In this example, it could be that the program itself was responsible for the increase. Or, it could be that parents of the students in the program read to them an extra hour during that month, so that is why their average scores improved. Or, it could be that this was a voluntary program so only children with very motivated parents signed them up to participate, and so on.

In this example and for other performance outcomes, absent the counterfactual that an impact study provides (i.e., what would have happened in the absence of the intervention), it can't be determined whether a change in performance (e.g., the five-point increase in testing scores) was due to the program, interventions at home, or something else. Thus, it's not possible to attribute causality in examining performance outcomes or conducting an outcome evaluation.

Q: Our office does after action reports and case studies on grants as a part of our performance and monitoring. Would those activities be considered evaluation too?

Those activities are important and useful contributions to performance management and program or grant monitoring, and can provide important descriptive information about what happened and how program or grant funds were spent. However, that doesn't mean that these efforts are program evaluations the way the Evidence Act and OMB M-20-12, OMB M-19-23, and OMB Circular A-11 define evaluation. For example, a site visit report from a grant monitoring visit does not constitute an evaluation.

How to consider case studies will depend on how they are designed. Typically they are not set up to answer questions related to the effectiveness of program activities or the impacts that can be attributed to them. Some program evaluations do include well-designed case studies that meet the standards in OMB M-20-12 and can provide useful evidence regarding processes and mechanisms associated with key outcomes, but again it would need to be informed by a strong theoretical or conceptual model and involve systematic data collection.

Q: How does this guidance relate to the Evidence Act work outlined in OMB M-19-23?

As documented in OMB M-19-23, OMB is working to ensure that implementation of the Evidence Act is coordinated, so the existing and forthcoming guidance documents (denoted under Phases 1 to 4) are meant to be integrative and complementary to one another.

OMB M-19-23 articulates the range of different types of evidence that agencies can and should consider as they build and use evidence, including program evaluation. When agencies undertake program evaluation – as part of answering learning agenda questions, significant evaluations on the Annual Evaluation Plan, or as they undertake any other evaluation – they should adhere to the standards presented in OMB M-20-12.

In practice, that means that every evaluation activity that an agency undertakes should adhere to the standards of relevance and utility, rigor, independence and objectivity, transparency, and ethics. In conducting these activities, agencies should use or aspire to the leading practices laid out in OMB M-20-12, such as build and maintain evaluation capacity, plan dissemination strategically, and foster and steward data management for evaluation.

Finally, it is worth noting that OMB M-19-23 lays out the requirements for Evaluation Officers, including that they be responsible for creating and implementing the agency-wide evaluation policy. The contents of that evaluation policy should be heavily guided by and adhere to the standards articulated in OMB M-20-12.

Q: How do the Evidence Act and OMB M-20-12 – in theory, policy, and practice – interact with the aspects of direct service, particularly in the context of public health?

To the extent that the general use of the term “evaluation” refers mainly to assessments (i.e., assessments of personal health, accuracy of payments, etc.), OMB M-20-12 only applies to activities that fall under the definition of program evaluation, as included in OMB M-20-12, OMB M-19-23, OMB Circular A-11, and the Evidence Act, which encompasses formal evaluation of programs, policies, and other contexts. Program evaluations of aspects of the direct service provision chain (e.g., the intake process or a particular type of case management for chronic conditions) would be considered program evaluations and the kind of activity that should be governed by OMB M-20-12.

On the broader question of how the Evidence Act intersects with public health and direct service, parts of the Evidence Act, like the learning agenda, are meant to include key questions related to an agency’s mission, which can include mission-strategic questions, but also operational questions, and direct service and public health would certainly be well within that scope. Some of these questions will be appropriately answered by program evaluation, and other questions will be answered by other types of analysis.