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OFFICE OF MANAGEMENT AND BUDGET  
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M-21-27

MEMORANDUM FOR HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

FROM: Shalanda D. Young  
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SUBJECT: Evidence-Based Policymaking: Learning Agendas and Annual Evaluation Plans

The Foundations for Evidence-Based Policymaking Act of 2018<sup>1</sup> (Evidence Act) urges the Federal Government to make decisions using the best available evidence. The complex issues and challenges facing the American people must be met with urgency, and doing so requires the use of facts arrived at through rigorous and systematic analysis, governed by principles of scientific integrity. In order to address these issues, it is critical to ensure, protect, and institutionalize the collection, dissemination, and use of high-quality evidence in a way that is informed by diverse viewpoints and methods. Addressing and solving current national crises, such as the COVID-19 pandemic or economic downturn, as well as future crises, depends on using the best available science and evidence. This guidance responds to the Presidential Memorandum on Restoring Trust in Government Through Scientific Integrity and Evidence-Based Policymaking.<sup>2</sup> It reaffirms and expands on previous OMB guidance on Learning Agendas and Annual Evaluation Plans, including OMB M-19-23,<sup>3</sup> OMB M-20-12,<sup>4</sup> and OMB Circular A-11.<sup>5</sup>

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<sup>1</sup> Pub. L. No. 115-435, 132 Stat. 5529 (2019), available at <https://www.congress.gov/115/plaws/publ435/PLAW-115publ435.pdf>.

<sup>2</sup> Presidential Memorandum, Restoring Trust in Government Through Scientific Integrity and Evidence-Based Policymaking (Jan. 27, 2021), <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/memorandum-on-restoring-trust-in-government-through-scientific-integrity-and-evidence-based-policymaking/>.

<sup>3</sup> See Office of Mgmt. & Budget, Exec. Office of the President, OMB M-19-23, *Phase 1 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Learning Agendas, Personnel, and Planning Guidance* (2019), available at <https://www.whitehouse.gov/wp-content/uploads/2019/07/M-19-23.pdf>.

<sup>4</sup> See Office of Mgmt. & Budget, Exec. Office of the President, OMB M-20-12, *Phase 4 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Program Evaluation Standards and Practices* (2020), available at <https://www.whitehouse.gov/wp-content/uploads/2020/03/M-20-12.pdf>.

<sup>5</sup> See Office of Mgmt. & Budget, Exec. Office of the President, OMB Circular No. A-11, *Preparation, Submission and Execution of the Budget* § 290 (Apr. 2021), available at <https://www.whitehouse.gov/wp-content/uploads/2018/06/a11.pdf>.

## **Governing Based on Evidence**

OMB expects agencies to use evidence whenever possible to further both mission and operations, and to commit to build evidence where it is lacking. A culture of evidence is not a new idea, and there are already leading examples of this culture throughout government. Nonetheless, we cannot achieve our nation's great promise unless these pockets of excellence are expanded to become the core of how the Federal Government operates. This Memorandum affirms the Federal Government's commitment to the Evidence Act and to building and nurturing a culture of evidence and the infrastructure needed to support it. This includes strengthening the Federal workforce to ensure that staff with the right skills and capabilities are positioned across the Federal Government.

Therefore, heads of agencies, including Secretaries, Deputy Secretaries, and other senior leaders, should engage in creating a culture of evidence in their agencies and support their staff in undertaking this work. This effort demands a comprehensive approach, and implementing this vision will require resources and prioritization from leaders. At the same time, this commitment to an evidence-based government cannot happen solely at the top or in isolated analytical offices, but rather must be embedded throughout each agency, in program offices and management offices, and adopted by the hardworking civil servants who serve on behalf of the American people.

Building on previous Evidence Act guidance, this document reinforces the central function that evidence-building broadly, and evaluation in particular, play in realizing the goal of evidence-based policymaking. The Evidence Act establishes critical leadership positions and activities to facilitate a culture of evidence. Fundamental to this task are effective processes to strategically plan for evidence building, using the Evidence-Building Plans (i.e., Learning Agendas) and Annual Evaluation Plans as tools. The Presidential Memorandum on Restoring Trust in Government Through Scientific Integrity and Evidence-Based Policymaking requires OMB to “issue guidance to improve agencies’ evidence-building plans and annual evaluation plans . . . and consider whether such plans . . . shall include a broad set of methodological approaches for the evidence-based and iterative development and the equitable delivery of policies, programs, and agency operations.”<sup>6</sup> OMB conducted stakeholder engagement to draft this guidance in response to the Presidential Memorandum, and the importance of stakeholder engagement is highlighted throughout the requirements described here.

This guidance applies to all agencies; CFO Act agencies have a statutory requirement as described in Title I of the Evidence Act,<sup>7</sup> and developing Learning Agendas and Annual Evaluation Plans benefits all agencies at both the agency and sub-agency levels. It is only through this shift to a culture of evidence, supported and demanded by agency leaders and brought to bear across agency functions, that we will build and maintain trust in government and ensure that decisions best serve the American people.

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<sup>6</sup> See Presidential Memorandum, Restoring Trust in Government Through Scientific Integrity and Evidence-Based Policymaking (Jan. 27, 2021).

<sup>7</sup> 5 U.S.C. §§ 311–315.

## **Opportunities from the Evidence Act**

The Evidence Act provides a statutory framework to advance this vision for a nation that relies on evidence and data to make decisions at all levels of government. To do so, it calls on agencies to strategically plan and organize evidence-building, data management, and data access functions to ensure an integrated and direct connection to evidence needs. This guidance reaffirms and expands on previous OMB guidance on Learning Agendas and Annual Evaluation Plans, including OMB M-19-23, OMB M-20-12, and OMB Circular A-11.<sup>8</sup> OMB recognizes that the collection, curation, governance, protection, and transparency of data are also essential for evidence-building but are outside the scope of this memo.<sup>9</sup>

OMB strongly believes that implementing the Evidence Act is not a compliance exercise, and that agencies should develop the required Title I deliverables (i.e., the Learning Agenda, Annual Evaluation Plan, and Capacity Assessment for Statistics, Evaluation, Research and Analysis) in a way that fulfills their purpose as strategic, evidence-building plans. Agencies should not simply produce the required documents and then turn their attention elsewhere; success requires that agencies develop processes and practices that establish habitual and routine reliance on evidence across agency functions and demand new or better evidence when it is needed. OMB has provided, and will continue to provide, agencies with flexibility whenever possible for these Title I deliverables so that they can implement these requirements of the Evidence Act in ways that are meaningful and long-lasting. OMB's focus is on outcomes, a desired end state where agencies use all available evidence to make better program, operational, and other decisions, build evidence where it is lacking, and ultimately serve the American people more effectively. This is a key value proposition of the Evidence Act; the processes and required deliverables are often simply the means to achieve that end.

### *Leadership to Build and Use Evidence*

Recognizing the need for strong leadership across the Federal Government to shepherd the changes envisioned by the Evidence Act, the Act requires the designation of agency Evaluation Officers, Statistical Officials, and Chief Data Officers. The Evaluation Officer is responsible for leading the development and execution of the agency's Learning Agenda, Annual Evaluation Plan, and other evaluation activities in partnership with other designated officials and agency leaders. Importantly, the Evaluation Officer is expected, and for specific activities required, to coordinate and collaborate with the Chief Data Officer and Statistical Official. OMB also expects agency heads to play key roles in advancing evidence building and use in their agencies by prioritizing Evidence Act implementation and related activities.

To realize the goals of Learning Agendas and Annual Evaluation Plans, Evaluation Officers must adhere to scientific integrity principles, demonstrate a learning and improvement orientation to the building and use of evidence, and have substantive expertise in evaluation methods and practices. Per OMB M-19-23, the Evaluation Officer must be appointed without regard to

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<sup>8</sup> See OMB M-19-23, OMB M-20-12, and OMB Circular No. A-11.

<sup>9</sup> See OMB M-19-23, at 4, which outlined phases of Evidence Act guidance. OMB still expects to issue guidance on Open Data Access and Management (Phase 2) and Data Access for Statistical Purposes (Phase 3).

political affiliation and possess “demonstrated, senior-level technical expertise in evaluation methods and practices and . . . appropriate expertise in the culture, disciplines, and policy areas of the agency.”<sup>10</sup> More specifically, OMB has determined that the role should be filled by a senior career employee with the skills and expertise to maintain principles of scientific integrity throughout the evaluation process, ensure adherence to the agency evaluation policy, and maintain the standards in OMB M-20-12. Critically, the Evaluation Officer must also have sufficient time and resources to lead and execute this work, which requires limiting, to the extent practicable, the number of other roles that the Evaluation Officer is tasked to fill. Agencies are reminded that they must report any changes in their designated Evaluation Officer to OMB via email at [EvidenceAct@omb.eop.gov](mailto:EvidenceAct@omb.eop.gov) and update their webpages accordingly.

Further, upholding scientific integrity and strengthening the Federal workforce requires that agencies ensure that the Evaluation Officer and other executives and staff supporting Evidence Act work, including, but not limited to, evaluation, statistics, research, and other analyses, have the necessary skills and expertise. In some cases, an agency will have to hire new staff if current staff do not have the requisite skills needed to execute high quality Evidence Act plans, evaluation studies, and related activities. This is consistent with the standards in OMB M-20-12, which state that evaluation activities must be managed by qualified evaluators with relevant education, skills, and experience for the methods undertaken.

### *Building a Culture of Learning and Evidence Across Government*

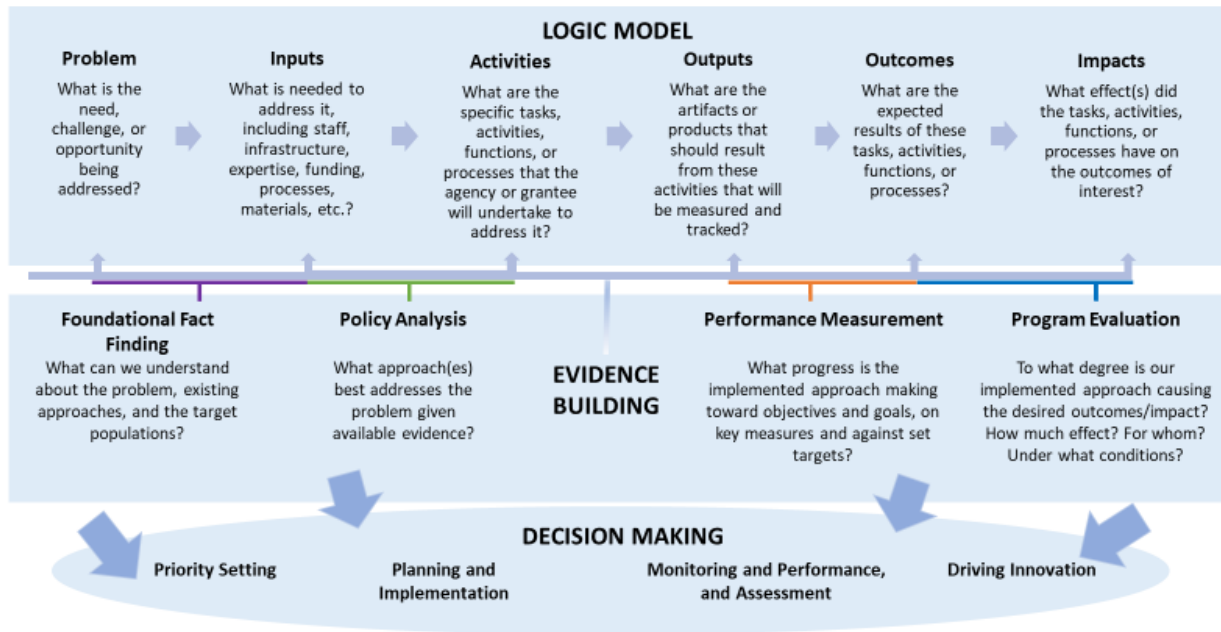
To create a more evidence-based government, Federal agencies should commit to building evidence where they do not have it, and to using existing evidence, sometimes in new ways and contexts. Agencies should use evidence to support processes like agency operations, grantmaking, human capital management and development, and program administration, as well as to support mission strategic areas, like program and service delivery. Understanding how evidence will be used is paramount from the beginning. Rather than building evidence without a clear use in mind, agencies should think about how the evidence may be used and how its use may benefit programmatic, management, regulatory, or operational decision-making within the agency and beyond. Evidence-building activities should be designed to generate usable information.

Many types of evidence can help identify possible improvements in programs and operations, while evaluation, specifically, helps agencies determine what is and is not working well and answer questions regarding why, for whom, and under what circumstances. As shown in Figure 1, the information gained from evidence-building activities should be used to improve program and policy design and implementation, as well as agency operations and regulations. Agencies should plan to build and use evidence across the program, policy, and operations lifecycle—from problem identification to implementation, assessment, and evaluation.

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<sup>10</sup> See OMB M-19-23, app. C, at 26 (describing the qualifications for agency Evaluation Officers).

**Figure 1:**  
**Using Evidence to Improve Agency Processes**



Agencies have already begun the hard work of implementing Learning Agendas and Annual Evaluation Plans; OMB recognizes and applauds these efforts, which were often done under very challenging conditions. While OMB is encouraged by the commitment and progress so far, there is more to do. Successfully implementing these parts of the Evidence Act requires agency staff and external stakeholders to break down traditional silos and collaborate in new ways. The need to collaborate extends within and across agencies as well; evidence-based government requires cross-agency work including data sharing in support of addressing Learning Agenda and evaluation activities; engaging on cross-cutting priorities, such as equity and climate change; and addressing shared operational and management challenges. To achieve government-wide implementation of Title I of the Evidence Act, it is OMB’s expectation that small agencies, non-CFO Act agencies, and sub-components such as bureaus and sub-agencies will also take up this call and undertake the activities outlined in this guidance to the extent practicable.

## Strategic Evidence Building

### *Overview of Learning Agendas and Annual Evaluation Plans*

The Learning Agenda, or strategic evidence-building plan,<sup>11</sup> serves to focus agency attention on the evidence needed to solve big problems. In building a Learning Agenda, agency leaders and diverse stakeholders can help identify both evidence needs and evidence gaps aligned with strategic goals and objectives as identified in the Agency Strategic Plan<sup>12</sup> by asking, what is it that our agency needs to do, what do we need to know to do it best, and what do we wish we knew? By thinking strategically about evidence needs, agencies can limit ad hoc and scattered analytic efforts, and the associated inefficient use of scarce resources, instead prioritizing those questions that, when answered, can inform pressing decisions and high-priority functions. Once developed, agencies should use their Learning Agendas and Annual Evaluation Plans to execute the identified evidence-building activities that, in turn, will produce evidence that will inform and shape subsequent priority questions.<sup>13</sup> These documents are intended to be actionable guides, and we expect that agencies will undertake and accelerate the evidence-building activities contained in them, recognizing that some specific elements may change and some may rely on partnerships with other agencies or external researchers. These plans only serve their purpose when they guide and bring about action.

As agencies develop and implement their Annual Evaluation Plans, they are reminded that the plans should include only those activities that meet the statutory definition of evaluation<sup>14</sup> and each agency's definition of "significant."<sup>15</sup> The Annual Evaluation Plan need not be limited to only those evaluations that address Learning Agenda questions and can also address other significant evaluations. Furthermore, OMB expects that agencies may also undertake evaluations that are not contained in the Annual Evaluation Plan, depending on how "significant" is defined. Evaluation activities included in the plan should be those the agency expects will begin, or be carried out, partially or fully in the associated fiscal year. Evaluation studies often

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<sup>11</sup> The Evidence Act refers to these documents as "evidence-building plans." The terms "evidence-building plan," "Learning Agenda," and "strategic evidence-building plan" are synonymous, and agencies should use whichever term best meets their needs. *See* OMB M-19-23, Appendix B: Further Guidance on Learning Agendas.

<sup>12</sup> The Strategic Plan "presents the long-term objectives an agency hopes to accomplish, set at the beginning of each new term of an Administration. It describes general and longer-term goals the agency aims to achieve, what actions the agency will take to realize those goals and how the agency will deal with the challenges likely to be barriers to achieving the desired result. An agency's Strategic Plan should provide the context for decisions about performance goals, priorities, and budget planning, and should provide the framework for the detail provided in agency annual plans and reports." *See* OMB Circular No. A-11, § 200.22.

<sup>13</sup> *See* OMB M-19-23, Appendix B: Further Guidance on Learning Agendas for additional discussion on priority questions.

<sup>14</sup> Per section 101(a) of the Evidence Act, "[t]he term 'evaluation' means an assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency." 5 U.S.C. § 311(3).

<sup>15</sup> *See* OMB M-19-23, at 34, "the significance of an evaluation study should be defined by each agency and take into consideration factors such as the importance of a program or funding stream to the agency omission, the size of the program in terms of funding or people served, and the extent to which the study will fill an important knowledge gap regarding program, population(s) served, or the issue(s) the program was designed to address."

span multiple years, so agencies can determine how best to capture ongoing activities as they develop the plan each year.

### *Evidence Planning Processes*

The process of developing the Learning Agenda<sup>16</sup> (i.e., engaging stakeholders, reviewing available evidence, developing questions, planning and undertaking activities, disseminating and using results, and refining questions based on evidence generated) may be equally if not more beneficial than the resulting document itself. At its heart, this process is one of collective learning and continuous improvement, hence the “learning” frame in the document’s name. The Learning Agenda should be a flexible, iterative document that is revisited at least annually. The value of the Learning Agenda will only be realized if agencies have the flexibility to pivot and adjust the document as needed when new evidence is generated or as priorities change. The conversations that give rise to priority questions should continue as new evidence is developed, shared, and brought to bear on decision-making and agency functions, spurring new conversations and new questions. Thus, an integrated and inclusive process for Learning Agenda development is critical to ensure that the results from the subsequent activities are used in the future.

The processes for developing the Learning Agenda and Agency Strategic Plan should leverage and inform each other. This linkage ensures that Learning Agenda questions are aligned with strategic goals and objectives, thereby making the resulting evidence relevant and timely for agency needs. Similarly, the strategic plan benefits from the inclusion of Learning Agenda components by bringing evidence to bear in shaping strategic goals and objectives. OMB acknowledges that developing these two documents in parallel can be challenging, but this complementarity presents important advantages. Rather than have evidence follow strategy, developing the documents together allows evidence to inform strategy from the outset. Notably, the Evidence Act specified that the Learning Agenda is part of the agency’s strategic plan; OMB has further clarified that it should be an appendix or separate chapter of, or a document referenced in and posted along with, the strategic plan. Elements of the Learning Agenda must also be woven throughout the strategic planning narrative.

As agencies develop Learning Agendas and Annual Evaluation Plans, OMB expects agencies to meaningfully engage a diverse array of stakeholders; this engagement should not be done for compliance, but instead because different perspectives and views provide innumerable benefits. Agencies should engage stakeholders from the outset so that they can help shape the priority questions being asked or the study design, as appropriate, rather than waiting until the data needed to support the activity is being analyzed. OMB expects that agencies engage with internal agency stakeholders, such as staff who oversee the designs, processes, operations, or programs being discussed in the plan; other evaluation, statistics, analysis, data, enterprise risk management, and performance units and personnel in the agency; policy staff; regulatory staff; privacy and information law and policy personnel; and agency leadership.<sup>17</sup> The Evidence Act requires engagement with the public, State and local governments, and representatives of non-governmental researchers for Learning Agendas. Other key stakeholders include OMB itself,

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<sup>16</sup> See OMB M-19-23, app. B (Further Guidance on Learning Agendas).

<sup>17</sup> See OMB M-19-23, at 16.

recipients of Federal awards, Tribal and territorial governments, Congress, industry and trade groups, the academic and non-profit communities, and the communities and individuals that the agency ultimately serves. This is not an exhaustive list, nor should agencies simply check off the boxes to demonstrate that a member of each group was consulted. Rather, agencies should systematically and thoughtfully consider (e.g., through stakeholder mapping exercises) why engagement with specific stakeholders is important for both the agency and those engaged.

The benefits of robust stakeholder engagement cannot be overstated. It is through this work that agencies can ensure they are asking the most relevant and urgent questions, and generating needed information that will be used. Robust stakeholder engagement should advance equity and meet the needs of underserved communities, and cannot be accomplished without intentional interactions with diverse stakeholders. The exchange of perspectives, ideas, and information that this process provides allows agency staff to better understand how its policies, programs, and procedures affect and are experienced by recipients, the challenges those recipients face, and suggestions for improvement. These engagements also provide opportunities for the agency to explain the purpose and value of a Learning Agenda or an Annual Evaluation Plan and demonstrate how building evidence strategically can have far-reaching benefits. For example, in some agencies, engagement with State, local, Tribal, and territorial governments is critical to ensure that problems on the ground are reflected in agency priorities, and that agencies are building evidence in areas that will be of use to those closest to policy implementation. Engagement with external researchers helps agencies understand the body of evidence in a given area while providing critical information to allow academics to align their research to policy-relevant questions in order to help agencies solve big problems.

Agencies should conduct stakeholder engagement in a manner and using methods that are transparent, generate trust, and advance equity. The rich exchange of ideas that characterizes high-quality stakeholder engagement cannot be accomplished solely by issuing a formal Request for Information in the Federal Register, for example. While this can provide one form of input, additional methods are needed to hear from diverse stakeholders. For example, agencies should consider community engagement, participatory research methods, listening sessions or focus groups, technical working groups, one-on-one consultations, and a thorough consideration of the lived experiences of those affected by agency policies in order to determine how they can best engage. OMB acknowledges that employing these methods effectively may require clearance under the Paperwork Reduction Act, and encourages agencies to use available flexibilities, as appropriate, for these purposes, including those outlined in OMB Memorandum *Flexibilities under the Paperwork Reduction Act for Compliance with Information Collection Requirements*.<sup>18</sup>

As evidence is built, shared, and applied, and new priorities emerge, the Learning Agenda and associated activities must adapt to stay relevant. OMB understands that execution of some of the activities included in these plans will depend on appropriations, and that the flexible and iterative nature of these plans necessitates that they can and should change as context, circumstances, or priorities change, such as with the COVID-19 public health emergency. However, OMB expects

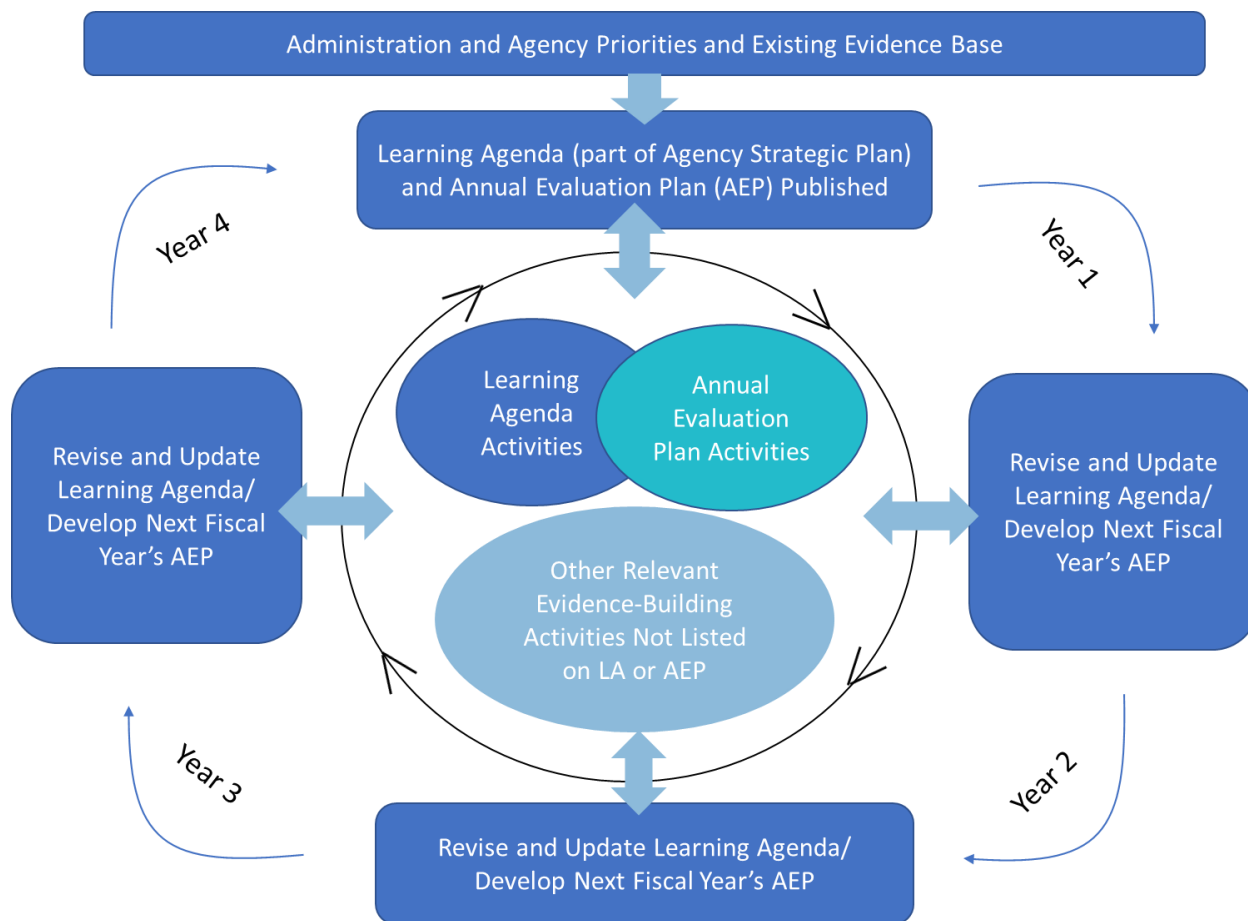
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<sup>18</sup> See Office of Mgm't & Budget, Exec. Office of the President, *Flexibilities Under the Paperwork Reduction Act for Compliance with Information Collection Requirements* (July 22, 2016), available at [https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/inforeg/inforeg/praflexibilities\\_memo\\_7\\_22\\_16\\_final.pdf](https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/inforeg/inforeg/praflexibilities_memo_7_22_16_final.pdf).



that agencies will undertake the activities on their Learning Agendas, to the extent practicable, even as these documents necessarily adapt. Future iterations of the Learning Agenda should build on and refer to evidence generated in response to the prior multi-year Learning Agenda, just as Annual Evaluation Plans should build on progress made and reflect the evidence produced in the prior year. Figure 2 below illustrates the four-year strategic planning and evidence planning cycles, and shows how the evidence produced from undertaking activities on the Learning Agenda and Annual Evaluation Plan, as well as other relevant evidence-building activities not included on these plans, is used to update the Learning Agenda and draft the next fiscal year’s Annual Evaluation Plan.

**Figure 2:  
The Evidence Cycle**



*Strategic Evidence-Building Plans*

The backbone of the Learning Agenda is the list of priority questions that reflect and distill the strategic thinking and engagement efforts described above into concrete, answerable questions aimed at informing high priority operational and mission strategic issues, including those on the agency’s regulatory agenda. OMB expects that agency Learning Agendas and Annual

Evaluation Plans address the Administration’s priorities, as relevant, as well as future priorities that may emerge. Pressing challenges face our country today, with urgent needs for evidence about the approaches that work best to solve them; agencies may use their Learning Agendas and Annual Evaluation Plans to identify evidence needs so as to undertake a government-wide effort to address current and future challenges, like climate change and the COVID-19 public health emergency. In addition to addressing immediate policy priorities, fundamental, long-term questions that are critical to improving an agency’s operations or its ability to meet its mission effectively should also be included in these evidence plans.

If the priority questions are the “North Star” of the Learning Agenda, the data and methods identified to address them provide the roadmap to get there. The activities agencies plan and carry out should draw on the full range of evidence types and methodological approaches. Appendix A of OMB M-19-23 describes four broad types of evidence that agencies should use as they implement the Evidence Act: foundational fact finding, policy analysis, program evaluation, and performance measurement. This guidance goes a step further to specify the broad range of methodological approaches that agencies should consider. These approaches include, but are not limited to: “pilot projects, randomized controlled trials, quantitative survey research and statistical analysis, qualitative research, ethnography, research based on data linkages in which records from two or more datasets that refer to the same entity are joined, well-established processes for community engagement and inclusion in research, and other approaches that may be informed by the social and behavioral sciences and data science.”<sup>19</sup> Agencies may consider other methods as well, consistent with OMB guidance, such as risk assessments<sup>20</sup> and inclusive methodologies including, but not limited to, participatory, emancipatory, community-based, user-led, and partnership research.<sup>21</sup> Engaging communities in this work can both promote equity and improve the rigor, relevance, and utility of evaluation and other forms of evidence. Finally, agencies are also encouraged to revisit OMB M-13-17 (Next

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<sup>19</sup> See Presidential Memorandum, Restoring Trust in Government Through Scientific Integrity and Evidence-Based Policymaking (Jan. 27, 2021).

<sup>20</sup> Agencies should consult the following OMB documents regarding these methods: Office of Mgm’t & Budget, Exec. Office of the President, Statistical Policy Directive No. 2: Standards and Guidelines for Statistical Surveys, 71 FR 184 (September 22, 2006), available at <https://www.govinfo.gov/content/pkg/FR-2006-09-22/pdf/06-8044.pdf>; Office of Mgm’t & Budget, Exec. Office of the President, Statistical Policy Directive No. 2: Standards and Guidelines for Statistical Surveys; Addendum: Standards and Guidelines for Cognitive Interviews, 81 FR 197 (October 12, 2016), available at <https://www.govinfo.gov/content/pkg/FR-2016-10-12/pdf/2016-24607.pdf>; Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies, 67 FR 8452 (Feb. 22, 2002), available at <https://www.federalregister.gov/documents/2002/02/22/R2-59/guidelines-for-ensuring-and-maximizing-the-quality-objectivity-utility-and-integrity-of-informat>; Office of Mgmt. & Budget, Exec. Office of the President, OMB M-19-15, *Improving Implementation of the Information Quality Act* (2019), available at <https://www.whitehouse.gov/wp-content/uploads/2019/04/M-19-15.pdf>.; and Office of Mgmt. & Budget, Exec. Office of the President, OMB M-05-03, *Issuance of OMB’s “Final Information Quality Bulletin for Peer Review”* (2004), available at <https://obamawhitehouse.archives.gov/sites/default/files/omb/assets/omb/memoranda/fy2005/m05-03.pdf>. Please note that this is not an exclusive list of methods that agencies may consider.

<sup>21</sup> Melanie Nind, *Inclusive Research: Research Methods* (Bloomsbury Academic 2020); Melanie Nind, *What is Inclusive Research?* (Bloomsbury Academic 2014); Kristin Andrews, Jenita Parekh, and Shantai Peckoo, *How to Embed a Racial and Ethnic Equity Perspective in Research: Practical Guidance for the Research Process – A Child Trends Working Paper* (2019), available at: [https://www.childtrends.org/wp-content/uploads/2019/09/RacialEthnicEquityPerspective\\_ChildTrends\\_October2019.pdf](https://www.childtrends.org/wp-content/uploads/2019/09/RacialEthnicEquityPerspective_ChildTrends_October2019.pdf).

Steps in the Evidence and Innovation Agenda) for additional approaches to building and using evidence, including using outcome-focused grant designs like tiered evidence, pay-for-performance approaches, waiver demonstrations that suspend certain requirements within programs and then undergo rigorous evaluation to test those changes, and opportunities to embed and test alternative strategies to achieve policy and program outcomes.<sup>22</sup>

Agencies must determine which types of evidence are needed to answer their questions, use appropriate methodological approaches that match those questions, uphold Federal scientific standards and guidance, and ensure that they have the infrastructure—specifically qualified staff with technical expertise—to undertake this work. OMB does not prefer a specific method or approach, and there is no requirement that agencies use a specific method or approach.<sup>23</sup> Rather, agencies must use the most rigorous methods that are appropriate to answer the specific question(s) being asked given considerations like timeline, feasibility, equity, and resources.<sup>24</sup> Agencies should also recognize that answering a specific question may require multi-faceted, mixed method approaches, which will entail engaging a range of staff and expertise, such as the Evaluation Officer, Chief Data Officer, Statistical Official, and Performance Improvement Officer, among others.

In choosing which methodological approach(es) to employ, agencies should emphasize the need for rigor.<sup>25</sup> Ensuring rigor requires adherence to quality and widely-accepted scientific principles across the lifecycle from planning and design of activities, through implementation and execution, and finally to interpretation and dissemination of findings. Rigor demands that evidence-building activities be conducted by qualified professionals with the relevant education, skills, and experience for the methods undertaken. Importantly, rigor is not defined by any particular evaluation type or analytic method. For example, a randomized controlled trial is not required for an evaluation to be rigorous, and using a method like a randomized controlled trial does not automatically ensure that an evaluation is conducted with the necessary rigor. Agencies must adhere to widely-accepted principles and practices for each evidence-building activity (e.g., foundational fact finding, policy analysis, program evaluation, and performance measurement), as well as policies issued by the Federal Government. Underlying all of the methodological approaches outlined here are the data collected and used in Federal evidence-building activities. Ensuring that those data are reliable, high-quality, and fit for their intended purpose is essential to restoring trust in Government. As agencies implement the evidence-building activities discussed in this guidance, they must adhere to the Paperwork Reduction Act (PRA) and the Information Quality Act (IQA), OMB's implementation guidance (i.e., OMB M-19-15, Improving Implementation of the Information Quality Act and Guidelines for Ensuring and

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<sup>22</sup> See Office of Mgm't & Budget, Exec. Office of the President, OMB M-13-17, Next Steps in the Evidence and Innovation Agenda (2013), available at <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2013/m-13-17.pdf>.

<sup>23</sup> This Memorandum should not be interpreted to suggest that behavioral science insights are preferred.

<sup>24</sup> See OMB M-19-23 and M-20-12, at 10. Specifically, see Footnote 22 in OMB M-20-12 cites the 2012 General Accountability Office Report, GAO-12-208G, Designing Evaluations 40 (rev. 2012), available at <https://www.gao.gov/assets/590/588146.pdf>, which suggests that experiments are best suited for small-scale interventions. OMB recognizes that while some Federal experiments may be small in scale, there are many examples of Federal agencies undertaking experiments with large samples.

<sup>25</sup> See OMB M-20-12, at 4, which includes rigor as one of five standards for program evaluation.

Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies), and their agency-specific IQA guidelines.<sup>26</sup> Specifically, agencies must ensure the quality of information throughout its lifecycle, “which includes creation, collection, pre-dissemination review, transparent and reproducible use, and ultimately correction and disposition.”<sup>27</sup> Further, agencies must consider the appropriate level of quality for each of the products it disseminates based on the use of that information. Strong implementation of the IQA will advance scientific integrity principles.

Transparency is a guiding principle for and a key component of scientific integrity. Federal evidence-building activities must be transparent in the planning, implementation, and completion phases to preserve accountability and help ensure that they are not tailored to generate specific findings. Learning Agendas and Annual Evaluation Plans are public-facing documents and should be posted on agency websites in a machine-readable format. The Federal Government needs partners to solve the big problems we face, and posting these documents publicly in a transparent way offers an opportunity for external partners to use their skills and expertise to help find solutions.

Similarly, OMB expects agencies to incorporate transparency throughout the evidence-building process, including in the release of findings, but also in the development and execution of activities. Decisions about purpose and objectives (including internal versus public use), the range of stakeholders who will have access to details of the work and findings, design and methods, and the timeline and strategy for releasing findings should be clearly documented before conducting activities. These decisions should take into consideration any legal, ethical, national security, or other constraints for disclosing information. Once activities are complete, comprehensive reporting of the findings should be released in a timely manner and provide sufficient detail so that others can review, interpret, or replicate/reproduce the work.<sup>28</sup> Even in those instances where findings cannot be shared (i.e., national security concerns or internal analyses), agencies should commit to a transparent process to clarify why findings are not available publicly. However, those results should be shared internally with the appropriate parties for learning, continuous improvement, and decision-making such that findings can be translated into action. When sharing findings, whether internally or publicly, agencies should aim to disseminate results through channels and in formats that will reach the broadest group of stakeholders possible.

Equity must also be considered as agencies build and use evidence, and should be considered throughout the lifecycle of evidence-building regardless of methodological approach. At the outset when priority questions are being identified, agencies should ensure that the full range of perspectives and voices are gathered to inform and refine those questions. Then, equity should be considered as agencies design and implement evidence-building activities, including, for

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<sup>26</sup> See Office of Mgmt. & Budget, Exec. Office of the President, OMB M-19-15, *Improving Implementation of the Information Quality Act 1–2* (Apr. 24, 2019), available at <https://www.whitehouse.gov/wp-content/uploads/2019/04/M-19-15.pdf>; Office of Mgmt. & Budget, Exec. Office of the President, *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies*, 67 FR 8452 (Feb. 22, 2002), available at <https://www.federalregister.gov/documents/2002/02/22/R2-59/guidelines-for-ensuring-and-maximizing-the-quality-objectivity-utility-and-integrity-of-informat>.

<sup>27</sup> See OMB M-19-15.

<sup>28</sup> See OMB M-20-12.

example, as the theory of change is developed, methods are selected, data collection and analysis plans are made, and dissemination and reporting plans are finalized. Early, active, and consistent engagement with stakeholders who can represent a diverse set of perspectives and experiences is critical so that evidence-building activities can yield high-quality insights and do not inadvertently perpetuate underlying biases. This focus on equity should work in concert with and reinforce the requirements for rigor and transparency noted above, and agencies should work to ensure that they are not in conflict with one another.

## **Evaluation as a Critical Agency Function**

While agencies should consider a range of evidence types, Title I of the Evidence Act elevates program evaluation as a critical agency function, which has been reinforced by the Presidential Memorandum. Evaluation, per the Evidence Act, means “an assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency.”<sup>29</sup> Existing OMB guidance describes the different types of evaluation (i.e., impact, outcome, process/implementation, and formative), discusses when they should be used, and provides potential research questions that each type of evaluation can answer.<sup>30</sup> Agencies should be clear that many activities, including independent audits,<sup>31</sup> basic scientific research and development, policy analysis, and performance measurement, are complementary to—but distinct from—program evaluation. These activities play an important role in the evidence enterprise, and agencies should consider using them to answer particular questions, recognizing that questions of effectiveness or efficiency should be answered by evaluation. Agencies should use caution, however, to align their methodological approach to the specific evidence-building need at hand. Claims of efficacy, impact, and effectiveness must be supported by research designs that can credibly generate causal evidence when well executed.

Agencies should use evaluation as a critical tool to learn and improve, rather than more narrowly to demonstrate whether something works or not. OMB expects that not all Federal evaluations will have positive findings; a well-designed and executed evaluation can produce valuable knowledge regardless of results. An orientation toward evaluation that acknowledges failure and emphasizes learning and continuous improvement is essential to meet the vision of an evidence-based government. Negative or null results can be invaluable in helping agencies to learn what works, what does not, and then most importantly, discern options for improvement. It is also necessary to understand the context in which something does or does not work, how effectiveness varies across communities or populations, and the aspects or component parts that may contribute to, or limit, effectiveness. These insights often require a mixed methods

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<sup>29</sup> 5 U.S.C. § 311(3).

<sup>30</sup> See OMB M-20-12; OMB Circular No. A-11, § 200.22.

<sup>31</sup> Independent audits, and the work of Inspector Generals, GAO, or external auditors, may focus on compliance and identifying waste, fraud, and abuse. This work may look at internal controls, systems, and risk, which includes the plan of organization, methods and procedures adopted by management to meet its goals, as well as process for planning, organizing, directing, controlling, and reporting on agency operations. See generally OMB Circular No. A-123. Due to the functionally separate nature of IG, GAO, and external audits, this function is distinct from program evaluation as defined in the Evidence Act and further elaborated on in OMB M-19-23, OMB M-20-12, OMB Circular No. A-11, and this Memorandum.

approach that integrates qualitative and quantitative data, bringing the nuanced perspectives and experiences of individuals together with relevant statistics.

Agencies should plan and anticipate the need for evaluation during program design at the outset of program implementation and when considering program changes and adjustments. Bringing evaluators into the conversation early enables specification of the data and design requirements from the start. This helps ensure that evidence can be used to inform program design, that the necessary data will be collected for a rigorous evaluation, and that the results from the evaluation can be used to improve program operations. For Federal awards, agencies should similarly consider all available evidence when complying with the OMB uniform grants guidance on program design<sup>32</sup> and when planning performance reporting requirements<sup>33</sup> in order to leverage existing evidence or determine new opportunities to add to the body of evidence.

Evaluation is a scientific activity, and agencies must uphold scientific integrity as they undertake evaluation activities. Pursuant to the Evidence Act, OMB M-20-12 provides the program evaluation standards to which agencies must adhere when conducting evaluations and evaluation activities. These standards are relevance and utility, rigor, independence and objectivity, transparency and ethics. OMB M-20-12 also provides examples of leading practices for agencies to draw upon as they implement these standards.

### **Institutionalizing Evidence-Building**

Agencies must integrate evidence-building into routine practices and policies in order to institutionalize a commitment to using evidence for learning, continuous improvement, and decision-making, all in ways that reflect scientific integrity. Establishing processes for developing, executing, and updating the Learning Agenda and Annual Evaluation Plan are a key part of this but depend on a broader foundation. The public-facing, agency-wide evaluation policy is another piece of the foundation and serves to document the standards and practices governing all of an agency's evaluation activities. Conducting the Capacity Assessment provides an opportunity to discover, describe, and assess the agency's evidence-building infrastructure. None of this happens without the requisite capacities and resources, but determining where resources should be targeted requires identifying where current evidence capacity is not sufficient to meet needs. A commitment to learning and continuous improvement requires mechanisms to monitor and report on progress, continually share what is learned and what gaps remain, and direct resources to newly-discovered evidence-building priorities. Further, OMB expects that agency budget requests will be justified by evidence to the extent possible. When such justification is not possible, that suggests an area where more or better evidence should be built.

#### *Evaluation Policies*

Agency evaluation policies, required by the Evidence Act, must reflect and include the standards outlined in OMB M-20-12. OMB expects that these policies will identify concrete ways that the agency plans to safeguard these standards. OMB also encourages agencies to consider how

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<sup>32</sup> 2 CFR § 200.202.

<sup>33</sup> 2 CFR § 200.301.



agency evaluation policies can advance equity. Agencies that have not already posted their evaluation policies are directed to submit a draft to OMB no later than September 30, 2021, and post their evaluation policies on their respective agency websites no later than February 2022. Once posted, agencies are directed to notify OMB via email to [evidence@omb.eop.gov](mailto:evidence@omb.eop.gov) with a link to the publicly available evaluation policy. As agencies implement their evaluation policies, they must ensure that such policies apply not only to Federal evaluation offices, but also to other Federal units that carry out or sponsor evaluations and to individual evaluators, including Federal evaluation staff, outside partners, and recipients of Federal awards that are performing work on behalf of the agency.<sup>34</sup>

### *Capacity Assessment for Research, Evaluation, Statistics, and Other Analysis*

The Evidence Act requires each agency to produce a Capacity Assessment for research, evaluation, statistics, and other analysis as a separate chapter or appendix in its strategic plans. Details about this capacity assessment are included in Section 290 of Circular A-11.<sup>35</sup> The agency's Capacity Assessment should be an objective accounting of an agency's capacity (the sufficiency of, e.g., the agency's staffing, funding, infrastructure, and processes) to carry out the evidence-building activities needed to meet its agency functions and its capacity to disseminate and use evidence. OMB views this document as an opportunity for agencies to highlight areas where capacity is currently lacking and where new or different investments could further the evidence-building enterprise. While agencies may be concerned with suggesting areas for improvement, it is only with this information that OMB and ultimately Congress can recognize where investments are needed. The Capacity Assessment also provides an opportunity for agencies to highlight areas of strength, which can both further their own missions and serve as models and peer supports for other agencies. The Capacity Assessment should not be a compliance exercise; OMB is particularly interested in understanding how the agency intends to use the information for action and improvement.

### *Agency Resources for Evaluation*

With the elevation of program evaluation as a key agency function, OMB expects agencies to make the investments needed to support it, recognizing that evaluation requires sufficient funding, dedicated planning, and specialized expertise. For example, an impact evaluation requires a high standard of methodological rigor in order to accurately demonstrate causality; in some cases, this may necessitate new primary data collection or long-term, multi-year participant follow up. Similarly, an implementation evaluation that documents the key characteristics of a program requires the use of implementation science to execute a systematic, rigorous, transparent, and objective study. Agencies should move beyond the bare minimum and ensure that evaluation resources are robust, reflect a culture of learning and improvement, and support the evaluation standards outlined in OMB M-20-12 necessary to execute high quality evaluations. Investing in evaluation is not in opposition to mission-critical tasks; it is itself a mission-critical function as it supports effective program implementation and delivery on mission. This investment requires adequate funding for evaluation studies (and flexibilities to use those dollars effectively) and for staffing to support the design, direction, and oversight of

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<sup>34</sup> See OMB M-20-12, at 2.

<sup>35</sup> See OMB Circular No. A-11, § 290.

those studies. Elevating and strengthening the role of evaluation requires the associated resources to ensure the quality, rigor, and credibility needed for public trust in Government.

Evaluation activities should be sufficiently funded, and the amount or percentage of funds devoted to evaluation should be based on what is appropriate for each funding stream and for each agency, including a sub-agency, operating division, or bureau. An agency committed to evaluation will use diversified funding sources, if available and allowable, to support a comprehensive portfolio of evaluation activities, including department-wide, working capital, or similar funds that leverage contributions across the agency; a portion of program funds (particularly for agency priorities and large investments); set-asides in statute for evaluation; and partnerships with other Federal agencies with shared goals and missions. Agencies have used a variety of strategies to successfully optimize the use of funds available for evaluation, which typically requires coordination with agency counsel and budget offices. For example, some agencies may have statutory authorities that enable them to: use a portion of unobligated program funds for evaluation, spend funds over longer periods of time through multi-year or no-year funds, or deobligate and reobligate unused funds towards other priority evaluation activities in the same fiscal year or the subsequent fiscal year. Such authorities, where applicable and allowable, may be able to support inherently complex, dynamic evaluation studies that span several fiscal years or that require phased execution to account for timing uncertainties and cost variations.

Funding strategies that encourage evaluation can play a valuable role in inspiring innovation and documenting results. Administrative waivers for State, local, Tribal, and territorial governments, particularly when using Federal formula funds or block grants, may be available in certain situations to incentivize evaluations or fund evidence-based programs. A demonstration authority in statute may typically include the ability or even a requirement to test the effectiveness of new or alternative approaches. Appropriation legislation or other statutes also may provide authority to set aside a portion of the agency's funds for evaluation within new programs or on a one-time basis to document results and understand implementation. Additionally, agencies can structure funding announcements that incorporate evaluation from the outset to meaningfully document results achieved; designing programs in this way can enable agencies to address priority questions identified in the Learning Agenda and/or to measure progress towards an agency priority goal. Agencies can also incentivize evaluation and evidence-based programming through tiered evidence mechanisms, where evaluation requirements are built into the agency's implementation of programs or grants, and larger investments are available for strategies with stronger demonstrated evidence of effectiveness.

Program evaluation is an important component of program planning and design to understand the results achieved with Federal funding,<sup>36</sup> therefore, OMB reminds agencies that evaluation costs are allowable costs (either as direct or indirect) of Federal awards, unless prohibited by statute or

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<sup>36</sup> Chief Fin. Officers Council & Performance Improvement Council, *Managing for Results: Performance Management Playbook for Federal Awarding Agencies* (Apr. 27, 2020), available at (<https://www.cfo.gov/wp-content/uploads/2021/Managing-for-Results-Performance-Management-Playbook-for-Federal-Awarding-Agencies.pdf>). The Playbook emphasizes evaluation as an important component of program planning and design to understand the results achieved with Federal funding. More information is available at <https://www.cfo.gov/financial-assistance>.



regulation.<sup>37</sup> An agency should specify any requirements of award recipients' participation in a Federally funded evaluation and any evaluation activities required to be conducted by the Federal award, as a part of the terms and conditions.<sup>38</sup> Then, the budget and program plans of Federal awards should include considerations for program evaluation purposes.<sup>39</sup> Agencies may also request exceptions to their implementation of 2 CFR § 200 in support of innovative program designs that apply a risk-based, data-driven framework to alleviate select compliance requirements and hold recipients accountable for good performance.<sup>40</sup> These provisions are consistent with the goals of the Evidence Act and the Presidential Memorandum.

OMB expects agencies' investments in evaluation to extend to hiring, retaining, and developing qualified employees to oversee evaluation activities, including the work of the agency's Evaluation Officer. Expertise in evaluation is required whether evaluation functions are conducted by an agency-wide, centralized evaluation office; an evaluation unit within a sub-agency, operational division, or bureau; or within a program office or other unit. Agencies should work strategically to invest in and build the capacity of their evaluation workforce, including the role of the Evaluation Officer, to prioritize technical expertise and meet the demands of an evidence-based Government. OMB expects agency human resources leaders to assist Evaluation Officers in developing position descriptions to meet the demands of an evaluation workforce with wide-ranging skills.

### *Monitoring Progress and Reporting*

OMB is interested in two types of progress. First, agencies' Learning Agendas and Annual Evaluation Plans should reflect past progress in undertaking activities to the extent that discussing past activities supports the contents of the current evidence-building plans. Second, OMB expects agencies to report on the evidence built from these activities—what they learned, and how that information has been used to influence decisions and improve their agency's programs, policies, regulations, and operations—recognizing the flexible nature of these plans and that some activities may not happen as planned or even have received the necessary appropriations. Progress should be reported to OMB through mechanisms such as the Annual Evaluation Plan, updates to the current Learning Agenda, future Learning Agendas, Annual Performance Reports,<sup>41</sup> and budget submissions, among others.

### **Conclusion**

There has never been greater urgency for actionable evidence to inform decision-making to serve the needs of the American people. To achieve our nation's great promise, relying on high-quality, credible evidence must become the core of how we operate. Agencies must make

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<sup>37</sup> See 2 CFR § 200.413(b), which includes program evaluation costs as an allowable direct cost.

<sup>38</sup> See 2 CFR § 200.301(c), which clarifies that provision 2 CFR § 200.301 is designed to operate in tandem with the Evidence Act and explains that a Federal awarding agency should also specify any requirements of award recipients' participation in a federally funded evaluation, and any evaluation activities required to be conducted by the Federal award.

<sup>39</sup> See 2 CFR § 200.308(a), which explains that budget and program plans approved during the Federal award process include considerations for performance and program evaluation.

<sup>40</sup> See 2 CFR § 200.102(d), which clarifies when Federal agencies may request exceptions.

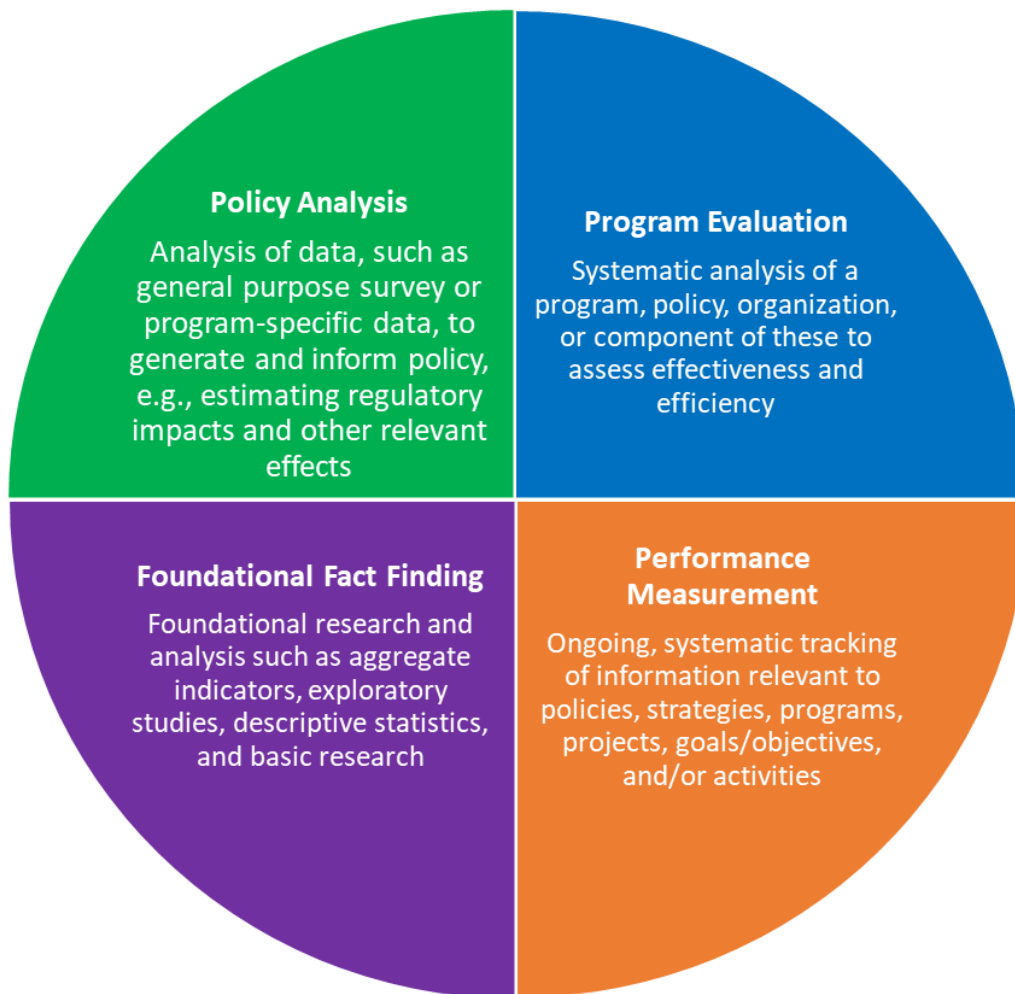
<sup>41</sup> See OMB Circular No. A-11, § 210.21.

evidence-based decisions guided by the best available science and data, and build and use this evidence in a way that upholds scientific integrity and is free from political considerations. Now is the time for agencies to identify what they already know to be true and ask the tough questions about what they still need to learn. Our government must continue to invest in those activities and functions that work, continually identify areas where improvement is possible, ensure that evidence meets agencies' and stakeholders' needs, and strive to build evidence where it is lacking. The requirements of the Evidence Act offer a mechanism for agencies to strategically plan, build, and use evidence, while also investing in the infrastructure and staff needed to do so. This Administration is committed to realizing the Evidence Act's vision for an evidence-based government and supporting agencies as they undertake this important work.

## Appendix A: Components of Evidence and Overview of Methodological Approaches

Figure A.1 (from OMB M-19-23) depicts and describes four interdependent components of evidence: foundational fact finding, policy analysis, program evaluation, and performance measurement. Each of these components informs and directs the others, and many evidence-building activities may be hard to categorize because they organically include more than one component. As agencies build and use evidence consistent with the Evidence Act and OMB M-19-23, they should consider these various types of evidence.

**Figure A.1: Components of Evidence**



**Table A.1** provides agencies with some examples of the types of evidence-building questions they may have, potential types of evidence that are appropriate to answer those types of questions, and sample methodological approaches, including those referenced in this guidance, that the agency could consider. This table is meant to be illustrative, not definitive. OMB recognizes that this is not an exhaustive list of methodological approaches and that the specific methodological approach selected may depend on a range of factors including feasibility, cost, and timeline. Agencies should work with their Evaluation Officer and evaluation experts help them determine which method is most appropriate to answer the question being asked.

**Table A.1: Evidence-Building Questions, Types, and Methods**

| <b>For Questions Like...</b>   | <b>Potential Evidence-Building Type</b>  | <b>Methodological Approaches May Include, But Are Not Limited to:</b>  |
|--|--|--|
| <p>Did the program, policy, regulation, or organization meet its pre-established goals?</p> <p>Are program activities being effectively or efficiently performed?</p> <p>Is service delivery as effective or efficient as planned?</p>                                 | <p><b>Performance Measurement</b></p> <p><i>Ongoing monitoring and reporting of program accomplishments, particularly progress toward pre-established goals</i></p>  | <ul style="list-style-type: none"> <li>• Tracking and Reporting Key measures (often relying on administrative data)</li> <li>• Data Dashboards</li> <li>• Value Stream Mapping</li> <li>• Root Cause Analysis</li> </ul>   |
| <p>What is happening in a particular program, organization, policy, or among a particular population?</p> <p>What are the demographic characteristics of participants, clients, or organizations?</p> <p>What characteristics are related to a particular outcome?</p> | <p><b>Foundational Fact Finding</b></p> <p><i>Efforts to systematically describe, through quantitative and/or qualitative data, a program, policy, regulation, organization, or population without inferring causality or measuring effectiveness.</i></p> | <ul style="list-style-type: none"> <li>• Community-Based, Participatory Research</li> <li>• Ethnography</li> <li>• Process or Journey Mapping</li> <li>• Correlational (Statistical) Analyses (Administrative and Survey Data)</li> <li>• Qualitative Interviews and Focus Groups</li> <li>• Document Reviews</li> <li>• Time Studies</li> </ul> |
| <p>Was the program, policy, regulation, or organization implemented as intended?</p> <p>How is the program, policy, regulation, or organization operating in practice?</p>   | <p><b>Process/Implementation Evaluation</b></p> <p><i>Assesses how the program, intervention, operation, regulation is implemented relative to its intended theory</i></p>   | <ul style="list-style-type: none"> <li>• Structured Observations</li> <li>• Qualitative Interviews and Focus Groups</li> <li>• Ethnography</li> <li>• Statistical Analysis of Program or Participant</li> </ul>  |

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|   | <i>of change, and often includes information on processes, content, quantity, quality, and structure of what is being assessed.</i>   | Data (Administrative Data and Surveys) <ul style="list-style-type: none"> <li>• Document Reviews</li> <li>• Time Studies</li> </ul>   |
| <p>What aspects of the program, policy, or organization do not seem to be working as intended?</p> <p>Can the program, intervention, policy be implemented as designed?</p>   | <p><b>Formative Evaluation</b></p> <p><i>Typically conducted to assess whether a program, policy, or organizational approach—or some aspect of these—is feasible, appropriate, and acceptable before it is fully implemented. Can include process and outcome measures.</i></p>       | <ul style="list-style-type: none"> <li>• Pilot Projects</li> <li>• Structured Observations</li> <li>• Qualitative Interviews and Focus Groups</li> <li>• Case Studies</li> <li>• Statistical Analysis of Program or Participant Data (Administrative Data and Surveys)</li> <li>• Community-Based, Participatory Research</li> </ul>  |
| <p>Were the intended outcomes of the program, policy, regulation, or organization achieved?</p>   | <p><b>Outcome Evaluation</b></p> <p><i>Measures the extent to which a program, policy, or organization has achieved its intended outcome(s), and focuses on outputs and outcomes to assess effectiveness. Cannot attribute causality.</i></p>   | <ul style="list-style-type: none"> <li>• Qualitative Interviews and Focus Groups</li> <li>• Statistical Analysis of Program or Participant Data (Administrative Data and Surveys), including Longitudinal Data</li> <li>• Data Linkages</li> </ul>  |
| <p>Does it (intervention, policy, program, regulation) work? Or, for whom does it work, under what conditions, and compared to the alternatives?</p> <p>Did it (intervention, policy, program, regulation) lead to the observed outcomes?</p> | <p><b>Impact Evaluation</b></p> <p><i>Estimates and compares outcomes with and without the program, policy, or organization, or aspect thereof, usually seeking to determine whether a causal relationship can be established between the activity and the observed outcomes.</i></p> | <p>Includes:</p> <p><i>Experimental Designs</i></p> <ul style="list-style-type: none"> <li>• Randomized Controlled Trials</li> </ul> <p><i>Quasi-Experimental Designs</i></p> <ul style="list-style-type: none"> <li>• Difference-in-Difference</li> <li>• Regression Discontinuity</li> <li>• Propensity Score and Other Matching Approaches</li> <li>• Instrumental Variable Modeling</li> </ul> <p>For each design:</p> <ul style="list-style-type: none"> <li>• Pilot Projects</li> </ul> |

|  |  |   |
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|  |  | <ul style="list-style-type: none"> <li>• Qualitative Interviews and Focus Groups</li> <li>• Structured Observations</li> <li>• Statistical Analysis of Program or Participant Data (Administrative Data and Surveys), including Longitudinal Data</li> <li>• Data Linkages</li> </ul> |
| Do the benefits of a policy, program, regulation, or organization exceed the costs?  | <p><b>Cost-Benefit Analysis</b></p> <p><i>Identifies and compares relevant quantitative and qualitative costs and benefits associated with a program, policy, regulation, or organization expressed in monetary terms.</i></p> | <ul style="list-style-type: none"> <li>• Qualitative Interviews and Focus Groups</li> <li>• Statistical Analysis of Program or Participant Data (Administrative Data and Surveys), including Longitudinal Data</li> <li>• Document Review</li> </ul>                                  |
| How much does a particular approach (program, policy, regulation, organization) to meeting a goal, objective, or outcome cost compared to an alternate approach, and is it more effective and by how much? | <p><b>Cost-Effectiveness Analysis</b></p> <p><i>Identifies the cost of achieving a single goal, nonmonetary outcome, or objective, which can be used to identify the least-costly alternatives for meeting that goal.</i></p>  | <ul style="list-style-type: none"> <li>• Qualitative Interviews and Focus Groups</li> <li>• Statistical Analysis of Program or Participant Data (Administrative Data and Surveys), including Longitudinal Data</li> <li>• Document Review</li> </ul>                                  |

## **Appendix B: Definitions (from OMB M-20-12: Phase 4 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Program Evaluation Standards and Practices)**

Agencies should use these definitions when implementing the Evidence Act requirements and other related evidence-building activities. These definitions may be superseded by future laws, OMB Circular No. A-11, or other OMB guidance, in which case agencies should be guided by those provisions.

**Descriptive Studies** can be quantitative or qualitative in nature, and seek to describe a program, policy, organization, or population without inferring causality or measuring effectiveness. While not all descriptive studies are evaluations, some may be used for various evaluation purposes, such as to understand relationships between program activities and participant outcomes, measure relationships between policies and particular outcomes, describe program participants or components, and identify trends or patterns in data.<sup>42</sup>

**Evaluation** means “an assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency.”<sup>43</sup> Evaluation can look beyond the program, policy, or organizational level to include assessment of particular projects or interventions within a program, for example, or particular aspects of a policy or functions or units within an organization. Importantly, there are different types of evaluation, each of which address different questions (*see* Formative Evaluation, Impact Evaluation, and Process/Implementation Evaluation). Evaluations may address questions related to the implementation or institution of a program, policy, or organization; the effectiveness or impact of specific strategies related to or used by a program, policy, or organization; and/or factors that relate to variability in the effectiveness of a program, policy, or organization or strategies of these. Evaluations can also examine questions related to understanding the contextual factors surrounding a program, as well as how to effectively target specific populations or groups for a particular intervention. They can provide critical information to inform decisions about current and future programming, policies, and organizational operations. Finally, evaluations can and should be used for learning and improvement purposes, as well as accountability purposes.<sup>44</sup>

**Evaluation Activities** include the planning, implementation, management, and reporting of activities overseen or coordinated by evaluators and related staff within a Federal agency. This includes, but is not limited to: developing and coordinating multi-year Learning Agendas, establishing Annual Evaluation Plans, planning and managing or conducting specific evaluations, summarizing evaluation findings for particular programs or policies, supporting other offices within an agency to interpret evaluation findings, and bringing evaluation-related evidence to bear in decision-making.<sup>45</sup>

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<sup>42</sup> See OMB Circular No. A-11, § 200.22 (discussing the term “descriptive studies” under the definition of “Evaluation”).

<sup>43</sup> Evidence Act § 101(e)(4)(B) (citing 5 U.S.C. § 311(3)).

<sup>44</sup> See OMB Circular No. A-11, § 200.22 (see first paragraph under the definition of “Evaluation”).

<sup>45</sup> See *id.* (discussing the term “Evaluation Activities” under the definition of “Evaluation”).

**Evaluators** are Federal staff and associated partners who are trained—through advanced education and evaluation experience (e.g., quantitative, qualitative and/or mixed-method evaluation specializations)—to properly plan, implement, manage, and/or oversee evaluation activities and evaluations. Some agencies may use interagency agreements, Federal awards, or other agreements to support the planning and implementation of these activities using qualified evaluators.

**Evaluation Officers** have authority and responsibility for providing leadership over agencies' evaluation and Learning Agenda activities. As stated in the Evidence Act, the head of each CFO Act agency must designate a senior employee of the agency as the Evaluation Officer of the agency. This shall be done without regard to political affiliation and based on demonstrated expertise in evaluation methodology and practices and appropriate expertise to the disciplines of the agency.<sup>46</sup> Non-CFO Act agencies, as well as sub-agencies, operational divisions, and bureaus of CFO Act Agencies are strongly encouraged to designate a qualified Evaluation Officer as appropriate.<sup>47</sup>

**Evidence**, as applied in the context of the Federal Performance Framework for improving organizational and agency performance, is viewed broadly as the available body of facts or information indicating whether a belief or proposition is true or valid. As such, evidence can be quantitative or qualitative and may come from a variety of sources, including foundational fact finding (e.g., aggregate indicators, exploratory studies, descriptive statistics, and other research), performance measurement, policy analysis, and program evaluation. Evidence has varying degrees of credibility, and the strongest evidence generally comes from a portfolio of high-quality, credible sources rather than a single source.<sup>48</sup>

**Findings** are the principle outcomes of an evaluation; what the evaluation suggested, revealed or indicated. In this guidance, “findings” refer to results, conclusions, and recommendations that are systematically generated through analyzing and interpreting data. The principal parties to an evaluation should ensure that the full evaluation findings with pertinent limitations are made accessible to the persons affected by the evaluation and any others with express legal rights to receive the results.<sup>49</sup>

**Formative Evaluation** is typically conducted to assess whether a program, policy, or organizational approach—or some aspect of these—is feasible, appropriate, and acceptable before it is fully implemented. It may include process and/or outcome measures. However,

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<sup>46</sup> 5 U.S.C. § 313(b).

<sup>47</sup> See OMB M-19-23, app. C, at 25–28.

<sup>48</sup> See OMB Circular No. A-11, § 200.22 (discussing credibility under definition of “Evidence”). Note that evidence is defined in 44 U.S.C. § 3561(6) as “information produced as a result of statistical activities conducted for a statistical purpose,” but that OMB M-19-23 takes a more expansive view of evidence to include foundational fact finding, policy analysis, program evaluation, and performance measurement. See OMB M-19-23, Appendix A.

<sup>49</sup> See, e.g., U.S. Gov't Accountability Office, GAO-18-568G, *Government Auditing Standards 2018 Revision*, ¶¶ 6.57, .61, .70 (2018), available at <https://www.gao.gov/assets/700/693136.pdf>; U.S. Dep't of Health & Human Servs., Ctrs. for Disease Control & Prevention, *Framework for Program Evaluation in Public Health, Morbidity and Mortality Weekly Report 48* (1999) (No. RR-11) <https://www.cdc.gov/mmwr/preview/mmwrhtml/rr4811a1.htm> (Step 6: Ensuring Use and Sharing Lessons Learned).



unlike outcome and impact evaluations, which seek to answer whether the program, policy, or organization met its intended goals or had the intended impacts, a formative evaluation focuses on learning and improvement and does not aim to answer questions of overall effectiveness.<sup>50</sup>

**Impact Evaluation** assesses the causal impact of a program, policy, or organization, or aspect thereof, on outcomes relative to those of a counterfactual. In other words, this type of evaluation estimates and compares outcomes with and without the program, policy, or organization, or aspect thereof. Impact evaluations include both experimental<sup>51</sup> (i.e., randomized controlled trials) and quasi-experimental designs. An impact evaluation can help answer the question, “does it work, or did the intervention lead to the observed outcomes?”<sup>52</sup>

**Intervention** is a combination of program elements or strategies related to the design and implementation of programs and policies designed to produce specific results.

**Outcome Evaluation** measures the extent to which a program, policy, or organization has achieved its intended outcome(s) and focuses on outputs and outcomes to assess effectiveness. Unlike impact evaluation above, it typically cannot discern causal attribution. Importantly, it is distinct from, but complementary to, performance measurement, as noted below. An outcome evaluation can help answer the question, “were the intended outcomes of the program, policy, or organization achieved?”<sup>53</sup>

**Performance Measurement** is the ongoing monitoring and reporting of program accomplishments, particularly progress toward pre-established goals. It is typically conducted by program or agency management. Performance measures may address the type or level of program activities conducted (process), the direct products and services delivered by a program (outputs), or the results of those products and services (outcomes).<sup>54</sup> It typically cannot discern causal attribution. Performance measurement is used to measure progress toward goals, and also used to find ways to improve progress, reduce risks, or improve cost-effectiveness.<sup>55</sup>

**Process or Implementation Evaluation** assesses how the program or service is delivered relative to its intended theory of change, and often includes information on content, quantity, quality, and structure of services provided. These evaluations can help answer the questions,

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<sup>50</sup> See OMB Circular No. A-11, § 200.22 (discussing the term “Formative Evaluation” under the definition of “Evaluation”).

<sup>51</sup> Per U.S. Gov’t Accountability Office, GAO-12-208G, *Designing Evaluations* 40 (rev. 2012), available at <https://www.gao.gov/assets/590/588146.pdf>, experiments in the evaluation context are most suitable for service and other programs where clearly defined interventions can be standardized and controlled; coverage is limited (small-scale); and randomly assigning participants is feasible and ethical. Experiments measure outcomes, preferably before and after the intervention, for a randomly assigned treatment group and a nonparticipating control group.

<sup>52</sup> See OMB Circular No. A-11, § 200.22 (discussing the term “Impact Evaluation” under the definition of “Evaluation”).

<sup>53</sup> *Id.* (discussing the term “Outcome Evaluation” under the definition of “Evaluation”).

<sup>54</sup> See U.S. Gov’t Accountability Office, GAO-11-646SP, *Performance Measurement and Evaluation: Definitions and Relationships* (May 2011), available at <https://www.gao.gov/assets/80/77277.pdf#page=2>.

<sup>55</sup> See Office of Mgmt. & Budget, Exec. Office of the President, OMB Circular No. A-94, *Guidelines and Discount Rates for Benefit-Cost Analysis of Federal Programs* 5 (Oct. 1992), available at <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/circulars/A94/a094.pdf#page=5>.

“was the program, policy, or organization implemented as intended?” or “how is the program, policy, or organization operating in practice?”<sup>56</sup>

**Program** refers to a set of projects or activities<sup>57</sup> that support a higher level objective or goal. For the purpose of this guidance, program includes processes, projects, interventions, policies, operations, activities, entities, and functions.<sup>58</sup> Program operations are the strategies, processes, and activities management uses to convert program inputs into program outputs.<sup>59</sup>

**Program Evaluation.** See Evaluation above.

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<sup>56</sup> See OMB Circular No. A-11, § 200.22 (discussing the term “Process or Implementation Evaluation” under the definition of “Evaluation”).

<sup>57</sup> Per Office of Mgmt. & Budget, Exec. Office of the President, OMB M-18-04, *Monitoring and Evaluation Guidelines for Federal Departments and Agencies that Administer United States Foreign Assistance 2* (2018), available at <https://www.whitehouse.gov/wp-content/uploads/2017/11/M-18-04-Final.pdf#page=3> (defining “program”), note that at some agencies, an activity carries out an intervention or set of interventions through a Federal award, and a project is a set of complementary activities, over an established timeline and budget, intended to achieve a discrete result. An intervention is a combination of program elements or strategies related to the design and implementation of programs and policies designed to produce specific results.

<sup>58</sup> See GAO-18-568G, ¶ 8.08 (describing the term “program”); OMB M-18-04, at 2 (defining the term “program”). Consistent with OMB Circular No. A-11, this guidance recognizes “that agencies and their stakeholders currently use the term ‘program’ in different ways. Agencies have widely varying missions and achieve these missions through different programmatic approaches, so differences in the use of the term ‘program’ are legitimate and meaningful. For this reason, OMB does not prescribe a superseding definition of ‘program’; rather, consistent with the GPRA Modernization Act, agencies may identify programs consistent with the manner in which the agency uses programs to interact with key stakeholders and to execute its mission.” OMB Circular No. A-11, § 200.22 (defining “program”).

<sup>59</sup> See GAO-18-568G, ¶ 8.38(e) (describing the term “program operations”).

**Appendix C: Timeline for Evidence Act Deliverables in FY21 and FY22** (from OMB Circular A-11, Part 6 – Section 200.22)

| Date   | Deliverable(s)  | Submit Via   |
|--|---|--|
| June 4, 2021   | As separate components of initial draft components of FYs 2022–2026 Strategic Plan:<br>- Annotated Outline of Agency Learning Agenda<br>- Initial Draft Capacity Assessment | <a href="#">MAX</a> Page “Performance Submission Portal”   |
| September 2021 (concurrent w/ FY 2023 Budget submission) | - Full Draft Learning Agenda*<br>- Full Draft Capacity Assessment*<br>- Draft FY 2023 Annual Evaluation Plan<br>* - separate sections of Full Draft Strategic Plan          | <a href="#">MAX</a> Page “Performance Submission Portal”   |
| No Later Than September 30, 2021                         | - Draft Agency Evaluation Policy  | MAX Page “Performance Submission Portal”   |
| December 23, 2021  | As separate components of final draft FYs 2022–2026 Strategic Plan:<br>- Final Draft Learning Agenda<br>- Final Draft Capacity Assessment                                   | <a href="#">MAX</a> Page “Performance Submission Portal”   |
| January 14, 2022   | - Final Draft FY 2023 Annual Evaluation Plan  | <a href="#">MAX</a> Page “Performance Submission Portal”   |
| February 2022 (concurrent with FY 2023 Budget release)   | - Final Learning Agenda<br>- Final Capacity Assessment<br>- Final FY 2023 Annual Evaluation Plan<br>- Post Agency Evaluation Policy   | Agency website/ evaluation.gov<br><br>For evaluation policy, also email OMB:<br><a href="mailto:evidence@omb.eop.gov">evidence@omb.eop.gov</a> |

Timelines for future years will be provided in subsequent OMB guidance.

## **Appendix D: Implementation Resources for Agencies**

OMB recognizes that agencies may need additional resources and support to implement the Evidence Act requirements addressed in this guidance and is committed to supporting agencies. Below are several resources that agencies are encouraged to consult and use throughout implementation.

### **Evidence and Evaluation Community of Practice**

The [OMB Evidence and Evaluation Community page](https://community.max.gov/x/iA_OJQ) on MAX (*available at [https://community.max.gov/x/iA\\_OJQ](https://community.max.gov/x/iA_OJQ)*), managed by the OMB Evidence Team, includes a curated library of materials to support agencies in developing Learning Agendas, writing annual evaluation plans, conducting capacity assessments, drafting evaluation policies, and general program evaluation and evidence-building activities, including:

- Example agency documents (e.g., Learning Agendas, evaluation plans, capacity assessments, and evaluation policies);
- Toolkits and other reference tools;
- Training opportunities and materials from prior trainings; and
- Other materials related to Evidence Act implementation.

### **OMB Evidence Team**

Within OMB, OMB's Evidence Team provides the policy home for evidence building and use across Government, with a particular focus on evaluation. The team has primary responsibility for overseeing implementation of the Title I requirements of the Evidence Act (i.e., Learning Agendas, Annual Evaluation Plans, Capacity Assessments, and evaluation policies). Staff from the Evidence Team are available to support agencies throughout implementation, and can be reached at [evidence@omb.eop.gov](mailto:evidence@omb.eop.gov).

### **Evaluation.gov Website (*Forthcoming*)**

### **Designated Official Orientation**

In September 2019, OMB hosted a multi-day orientation for the agency officials designated in the Evidence Act (i.e., Chief Data Officers, Evaluation Officers, and Statistical Officials), which focused on how to undertake and operationalize these roles. Materials from the orientation are available on MAX at: <https://community.max.gov/x/hSp7bw>.