



December 2019

# EVIDENCE-BASED POLICYMAKING

## Selected Agencies Coordinate Activities, but Could Enhance Collaboration

Accessible Version

# GAO Highlights

Highlights of [GAO-20-119](#), a report to congressional requesters

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December 2019

## EVIDENCE-BASED POLICYMAKING

### Selected Agencies Coordinate Activities, but Could Enhance Collaboration

#### Why GAO Did This Study

Congress and OMB have taken steps intended to strengthen federal evidence-building activities. In September 2017, a federal commission found that agencies had uneven capacity to support, or did not fully coordinate, a full range of evidence-building activities.

GAO was asked to examine the coordination of federal evidence-building activities. This report (1) describes selected agencies' actions that align with direction from Congress and OMB to strengthen evidence-building activities and (2) examines the extent to which selected agencies' processes for coordinating those activities reflect leading practices for collaboration.

To address these objectives, GAO reviewed documents and interviewed officials about federal evidence-building activities at five selected agencies. GAO selected these agencies based on the greater number of experiences they had in comparison to other agencies incorporating these activities into the design and implementation of certain programs. GAO assessed their coordination of these activities against four leading practices for collaboration identified in GAO's past work.

#### What GAO Recommends

GAO is making a total of seven recommendations to DOL, CNCS, and HHS to better reflect leading collaboration practices in their evidence prioritization processes. DOL concurred, CNCS neither agreed nor disagreed, and HHS did not concur with the recommendations. CNCS and HHS stated, but did not provide information to support, that each had already taken relevant actions. GAO continues to believe the recommendations are valid, as discussed in the report.

#### What GAO Found

Federal decision makers need evidence about whether federal programs and activities achieve intended results as they set priorities and consider how to make progress toward national objectives. The five agencies GAO reviewed took actions that align with direction from Congress and the Office of Management and Budget (OMB) to strengthen their evidence-building activities. The five agencies are: the Departments of Education, Health and Human Services (HHS), and Labor (DOL); the Corporation for National and Community Service (CNCS); and the U.S. Agency for International Development. For example, based on a statutory requirement, a majority of grant funding for HHS's Maternal, Infant, and Early Childhood Home Visiting program is to be used for home visiting models with sufficient evidence of their effectiveness. Consistent with this requirement, HHS annually assesses evidence, such as the results of program evaluations, to identify effective home visiting models that grantees can implement.

Evidence-building can involve assessing existing evidence, identifying any new evidence needs, and prioritizing when to fulfill those needs. These efforts are fragmented within each of the five agencies—that is, each has multiple organizational units with responsibilities for evidence-building. For example, DOL has established separate units responsible for different sources of evidence—evaluations, performance information, and statistics. Effective collaboration can help agencies manage this fragmentation, and lead to improved results.

GAO found that to assess existing evidence, each agency established a coordinated, agency-wide process that reflects leading practices for collaboration. Those leading practices are: (1) defining a *leadership* model; (2) involving relevant *participants*; (3) clarifying roles and *responsibilities*; and (4) documenting that information in written *guidance*. However, agencies' processes for determining which new evidence to generate, when, and how (i.e., prioritizing new evidence) did not always reflect the leading practices (see figure).

Agencies' processes to prioritize evidence mostly reflect leading practices for collaboration

Agency	GAO-identified leading practices for collaboration			
	Leadership	Participants	Responsibilities	Guidance
Corporation for National and Community Service	●	◐	◐	◐
Department of Education	●	●	●	●
Department of Health and Human Services	●	◐	●	◐
Department of Labor	●	◐	●	◐
U.S. Agency for International Development	●	●	●	●

● Reflects leading practice    ◐ Partially reflects leading practice

Source: GAO analysis of agency information. | GAO-20-119

Improving collaboration for their prioritization processes could help CNCS, DOL, and HHS more effectively target limited resources for evidence-building.

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### Abbreviations

3ie	International Initiative for Impact Evaluation
ACF	Administration for Children and Families
ADS	Automated Directive System
ASPE	Office of the Assistant Secretary for Planning and Evaluation
CAP	cross-agency priority
CEO	Chief Evaluation Officer
CLEAR	Clearinghouse for Labor Evaluation and Research
CNCS	Corporation for National and Community Service
CSP	Charter Schools Program
DOL	Department of Labor
DRG	Center of Excellence on Democracy, Human Rights, and Governance
Education	Department of Education
EEPC	Evaluation and Evidence Policy Council
ELG	Evidence Leadership Group
EPG	Evidence Planning Group
Evidence Act	Foundations for Evidence-Based Policymaking Act of 2018
FATAA	Foreign Aid Transparency and Accountability Act of 2016
GPRA	Government Performance and Results Act of 1993
GPRAMA	GPRA Modernization Act of 2010
HHS	Department of Health and Human Services
IDEA	Individuals with Disabilities Education Act
IES	Institute of Education Sciences
MIECHV	Maternal, Infant, and Early Childhood Home Visiting
NCCC	National Civilian Community Corps
NCER	National Center for Education Research
NCES	National Center for Education Statistics
NIH	National Institutes of Health

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**Abbreviations Continued**

OELA	Office of English Language Acquisition
OIG	Office of Inspector General
OMB	Office of Management and Budget
OPEPD	Office of Planning, Evaluation, and Policy Development
ORE	Office of Research and Evaluation
PFS	Pay for success
PIO	Performance Improvement Officer
PMC	Performance Management Center
PPL	Bureau for Policy, Planning, and Learning
USAID	U. S. Agency for International Development

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December 4, 2019

The Honorable Gary Peters  
Ranking Member  
Committee on Homeland Security and Governmental Affairs  
United States Senate

The Honorable Thomas Carper  
Ranking Member  
Permanent Subcommittee on Investigations  
Committee on Homeland Security and Governmental Affairs  
United States Senate

Federal decision makers need evidence about whether federal programs and activities achieve intended results as they set priorities and consider how to make progress toward national objectives. The Office of Management and Budget (OMB) defines evidence as “the available body of facts or information indicating whether a belief or proposition is true or valid.”<sup>1</sup> OMB’s guidance further states that evidence may come from a variety of sources, including descriptive statistics, performance measurement, policy analysis, program evaluations, and other research.

To ensure that decision makers have the evidence they need, agencies undertake a range of activities. Evidence-building activities involve assessing existing evidence and identifying any need for additional evidence; determining which new evidence to generate, when, and how (i.e., prioritizing new evidence); generating that evidence; and using evidence in decision-making. Congress and OMB have taken actions intended to strengthen federal evidence-building activities. For example, the Government Performance and Results Act of 1993 (GPRA), as updated and expanded by the GPRA Modernization Act of 2010, established a government-wide framework for generating and using performance information.<sup>2</sup>

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<sup>1</sup>OMB, Circular No. A-11, *Preparation, Submission, and Execution of the Budget*, pt 6, § 200.22 (June 2019).

<sup>2</sup>Pub. L. No. 103-62, 107 Stat. 285 (Aug. 3, 1993); Pub. L. No. 111-352, 124 Stat. 3866 (Jan. 4, 2011).

In March 2016, Congress passed, and the President signed, legislation establishing the Commission on Evidence-Based Policymaking to study the availability and use of evidence in government.<sup>3</sup> In its final report, issued in September 2017, the commission found that within federal agencies, multiple entities (i.e., component agencies or offices) had responsibilities for generating different sources of evidence.<sup>4</sup> However, the commission found that federal agencies' capacities to generate a full range of evidence were uneven. The commission further found that where capacity existed, it was often poorly coordinated. This included coordination within an agency—across its different evidence-building entities. In total, the commission made 22 recommendations aimed at strengthening federal evidence-building activities.

Subsequently, the Foundations for Evidence-Based Policymaking Act of 2018 (Evidence Act), enacted in January 2019, created a framework intended to take a more comprehensive and integrated approach to federal evidence-building activities.<sup>5</sup> According to OMB, the Evidence Act addressed about half of the commission's recommendations, advancing data and evidence-building functions in the federal government.<sup>6</sup> For example, in line with the commission's findings and recommendations, 24 major federal agencies are to designate an Evaluation Officer, who has responsibilities for coordinating evidence-building activities required by the Evidence Act with other relevant agency officials.<sup>7</sup>

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<sup>3</sup>Evidence-Based Policymaking Commission Act of 2016, Pub. L. No. 114-140, 130 Stat. 317 (Mar. 30, 2016).

<sup>4</sup>Commission on Evidence-Based Policymaking, *The Promise of Evidence-Based Policymaking* (Washington, D.C.: Sept. 7, 2017).

<sup>5</sup>Pub. L. No. 115-435, 132 Stat. 5529 (Jan. 14, 2019). The Evidence Act adopts as its definition of evidence "information produced as a result of statistical activities conducted for a statistical purpose." It adopts as its definition of statistical purpose "the description, estimation, or analysis of the characteristics of groups, without identifying the individuals or organizations that comprise such groups and includes the development, implementation, or maintenance of methods, technical or administrative procedures, or information resources that support" those actions. Pub. L. No. 115-435, § 101(a)(1); 44 U.S.C. § 3561(6), (12). OMB's June 2019 update to Cir. No. A-11 contains these definitions. The guidance also states that in the context of improving organizational and agency performance, "evidence" can be viewed more broadly, in line with OMB's definition.

<sup>6</sup>OMB Cir. No. A-11, at § 290.2 (2019).

<sup>7</sup>5 U.S.C. § 313.

You asked us to examine the coordination of federal evidence-building activities. In response to that request, this report (1) describes activities selected agencies took that aligned with congressional and OMB direction to strengthen evidence-building, and (2) examines the extent to which selected agencies' processes for assessing and prioritizing evidence needs reflect leading practices for collaboration.

To address both objectives, we analyzed agency documents about federal evidence-building activities and interviewed relevant staff at OMB and officials at five selected agencies: the Departments of Education, Health and Human Services, and Labor; the Corporation for National and Community Service; and the U.S. Agency for International Development. We selected these five agencies based on the greater number of experiences they had in comparison to other agencies' incorporation of evidence-building activities into the design and implementation of certain programs.<sup>8</sup> These experiences included evidence-based approaches, such as pay for success projects, performance partnerships, and tiered evidence grants.<sup>9</sup>

For the first objective, we reviewed information from the five selected agencies and identified examples of evidence-building activities within each agency since 2010. We then determined where these examples illustrated actions that aligned with evidence-building statutory requirements and directions from OMB, including guidance, memorandums, and activities outlined in the President's Management Agenda.<sup>10</sup>

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<sup>8</sup>We identified agencies that had designed and implemented pay for success projects, performance partnerships, and tiered evidence grants since 2010 by reviewing our related past work, conducting literature searches, and reviewing agency websites and information. OMB staff who have government-wide purview of federal agencies' use of these approaches confirmed the examples we found and identified a few others. Based on this information, we identified 11 agencies that had collectively designed and implemented 30 examples of evidence-based approaches. We selected the five agencies with the highest number of these approaches.

<sup>9</sup>Appendix III identifies and provides details about the use of evidence-based approaches at these agencies.

<sup>10</sup>OMB, *President's Management Agenda* (Washington, D.C.: Mar. 20, 2018). OMB released its initial guidance to agencies for implementing certain evidence-building activities required by the Evidence Act in June and July 2019. We did not examine agencies' implementation of those activities because most were not in effect during the course of our review.

For the second objective, we evaluated processes each selected agency established to take a coordinated approach to assessing and prioritizing evidence needs across the agency.<sup>11</sup> We compared these processes to leading practices for collaboration identified in our prior work.<sup>12</sup> For this report, we focused on a subset of four collaboration practices:

- defining a *leadership* model;
- involving all relevant *participants*;
- clarifying *roles and responsibilities* of those involved; and
- ensuring processes are documented and explained through *written guidance*.

We selected these four collaboration practices because our past work on evidence-building activities, such as analysis of performance information and program evaluations, has similarly identified them as key approaches related to evidence building.<sup>13</sup> Appendix I provides additional details about our objectives, scope, and methodology.

We conducted this performance audit from April 2018 to December 2019 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>11</sup>Although we focus on agencies' approaches for assessing and prioritizing evidence needs in this report, our past work has reviewed agencies' efforts to generate and use evidence, as described later in this report.

<sup>12</sup>GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sept. 27, 2012). In this 2012 report, we identified leading practices by reviewing literature on interagency collaborative mechanisms, analyzing our prior work on aspects of collaboration within the federal government, and interviewing academic and practitioner experts on collaboration. Based on that work, we determined that federal interagency collaborative mechanisms benefit from certain key features, which raise issues for agencies to consider when working collaboratively within or across agencies.

<sup>13</sup>See, for example, GAO, *Program Evaluation: Annual Agency-Wide Plans Could Enhance Leadership Support for Program Evaluations*, [GAO-17-743](#) (Washington, D.C.: Sept. 29, 2017); and *Managing for Results: Practices for Effective Agency Strategic Reviews*, [GAO-15-602](#) (Washington, D.C.: July 29, 2015).

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## Background

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### Federal Evidence-Building

According to OMB guidance, evidence can consist of quantitative or qualitative information and may be derived from a variety of sources.<sup>14</sup> Those sources include foundational fact-finding (e.g., aggregate indicators, exploratory studies, descriptive statistics, and other research), performance measurement, policy analysis, and program evaluation. OMB recommends that agencies build a portfolio of high-quality, credible sources of evidence—rather than a single source—to support decision-making. Further, since different sources of evidence have varying degrees of credibility, the use of evidence in decision-making requires an understanding of what conclusions can—and cannot—be drawn from the information.<sup>15</sup>

Evidence-building can be viewed as a cycle of activities that can help decision makers obtain the evidence they need to address policy questions or identify the questions they should address. As illustrated in figure 1, the following four activities comprise the evidence-building cycle:

- *assessing* existing evidence to determine its sufficiency and if additional evidence is needed to further understand results and inform decision-making;
- *prioritizing* among the identified needs which new evidence to generate, when, and how;
- *generating* new evidence, by collecting, analyzing, and synthesizing sources of data and research results; and

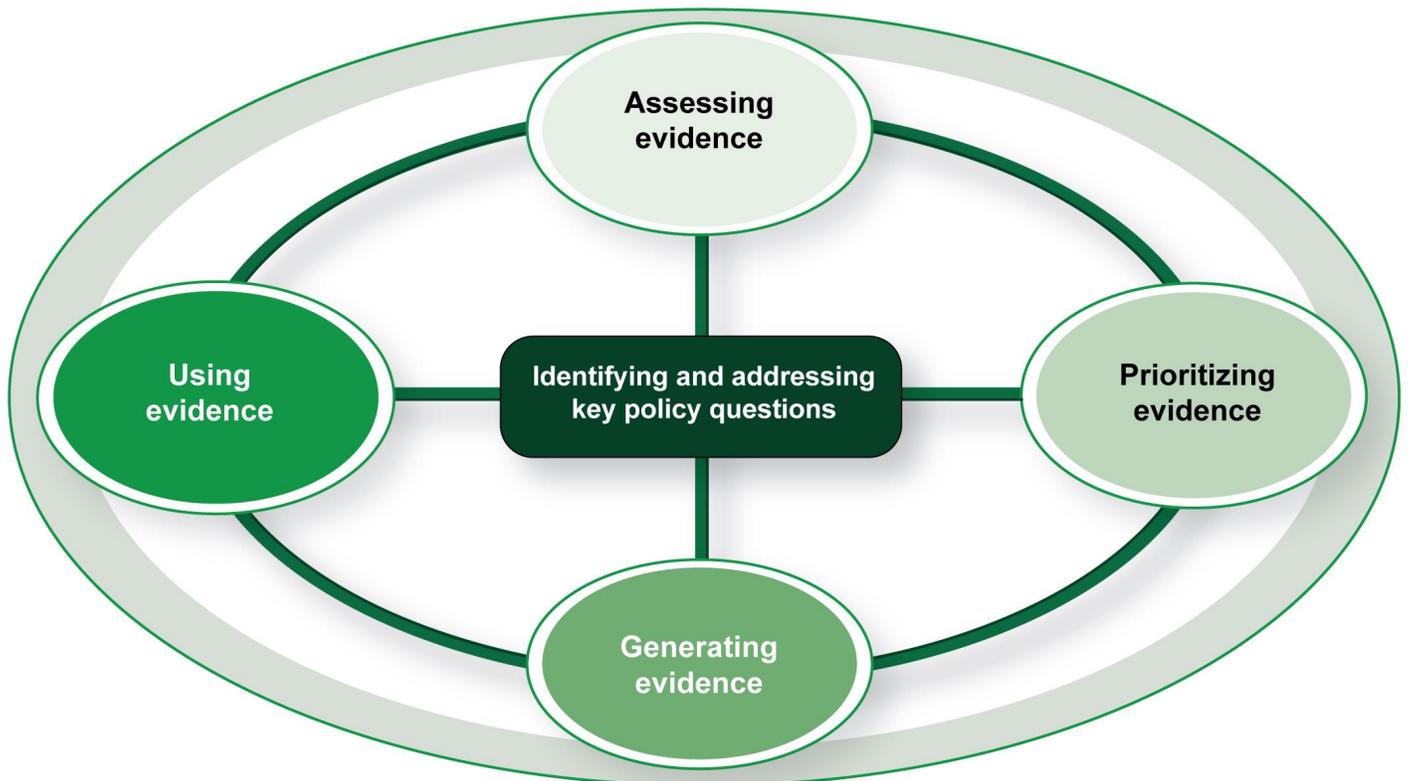
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<sup>14</sup>OMB Cir. No. A-11, § 200.22 (June 2019) and *Phase I Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Learning Agendas, Personnel, and Planning Guidance*, OMB Memorandum M-19-23 (Washington, D.C.: July 10, 2019).

<sup>15</sup>OMB's guidance illustrates the types of conclusions that can and cannot be drawn by sources of evidence. For example, it notes that multiple rigorous program evaluations may provide strong evidence that a particular strategy is effective in a particular setting or with a particular population. However, those sources may not provide certainty on the effectiveness of that approach in other settings or with different populations. See OMB Cir. No. A-11, § 200.17 (2019).

- *using* that evidence to support learning and decision-making processes.<sup>16</sup>

Figure 1: Evidence-Building Cycle



Source: Analysis of prior GAO work and Office of Management and Budget information. | GAO-20-119

Note: Prioritizing evidence means determining which new evidence to generate, when, and how. Our prior work highlights long-standing challenges agencies continue to face in generating some sources of evidence—developing performance measures for federal programs and conducting evaluations of their

<sup>16</sup>These activities are interrelated, and evidence-building does not always follow all four activities in a certain order. For example, after assessing existing evidence, agency officials could both use that evidence in decision-making processes and identify and prioritize needs for new evidence to generate.

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programs.<sup>17</sup> Our work also identified variations in the use of evidence for decision-making by agency leaders and managers.<sup>18</sup>

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## Fragmentation of Federal Evidence-Building Activities

The Commission on Evidence-Based Policymaking found that evidence-building activities are fragmented in the federal government. For example, it found that within agencies, many organizations have evidence-building responsibilities, including statistical agencies and programs, evaluation and policy research offices, performance management offices, policy analysis offices, and program administrators. In addition, the commission highlighted challenges the federal government faces in fully addressing cross-cutting research and policy questions when evidence-building activities span multiple agencies. The commission's final report noted that this fragmentation (see sidebar) can lead to duplication of effort or missed opportunities for collaboration.<sup>19</sup> The commission's report stated that when activities are fragmented within an agency or across the federal government, they should be coordinated to improve the capacity to fully address a specific research or policy question.

**Fragmentation** refers to those circumstances in which more than one federal agency (or organization within an agency) is involved in the same activity and opportunities exist to improve implementation of that activity.

Source: GAO. | GAO-20-119

Similarly, our past work highlights the importance of coordination and collaboration to reduce or better manage fragmentation, overlap, and duplication.<sup>20</sup> We found that uncoordinated or poorly coordinated efforts can waste scarce funds and limit their effectiveness. Even when efforts are coordinated, enhancements to those efforts can lead to improvements in effectiveness. As noted earlier, our work also identified leading

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<sup>17</sup>See for example, GAO, *Managing for Results: Further Progress Made in Implementing the GPRA Modernization Act, but Additional Actions Needed to Address Pressing Governance Challenges*, [GAO-17-775](#) (Washington, D.C.: Sept. 29, 2017), and [GAO-17-743](#).

<sup>18</sup>See for example, GAO, *Managing for Results: Government-Wide Actions Needed to Improve Agencies' Use of Performance Information in Decision Making*, [GAO-18-609SP](#) (Washington, D.C.: Sept. 5, 2018); [GAO-17-775](#); and [GAO-17-743](#).

<sup>19</sup>Commission on Evidence-Based Policymaking, *The Promise of Evidence-Based Policymaking* (Washington, D.C.: Sept. 7, 2017).

<sup>20</sup>See, for example, GAO, *Fragmentation, Overlap, and Duplication: An Evaluation and Management Guide*, [GAO-15-49SP](#) (Washington, D.C.: Apr. 14, 2015).

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practices that can help agencies enhance and sustain their implementation of collaborative efforts.<sup>21</sup>

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## Efforts to Improve Federal Evidence-Building

Congress and OMB have taken actions to strengthen federal evidence-building activities and improve coordination of those activities during the last decade. Figure 2 provides a timeline of selected actions. Appendix II provides additional detail regarding the selected actions.

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<sup>21</sup>See, for example, [GAO-12-1022](#) and GAO, *Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*, [GAO-06-15](#) (Washington, D.C.: Oct. 21, 2005).

**Figure 2: Selected Actions Taken by Congress and OMB to Strengthen Federal Evidence-Building and Improve Coordination**



Statutory changes  
 Executive branch actions

Source: GAO analysis of selected laws and information from OMB and the Commission on Evidence-Based Policymaking. | GAO-20-119

<sup>a</sup>Pay for success is a contracting mechanism under which final payment is contingent upon achieving specific outcomes. The government specifies performance outcomes in pay for success contracts and generally includes a requirement that contractors assess program outcomes or impacts through

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an independent evaluation. The evaluators also may generate and analyze performance data to inform program management and improvement during implementation.

<sup>b</sup>Tiered evidence grants seek to incorporate evidence of effectiveness into grant making. Federal agencies establish tiers of grant funding based on the level of evidence grantees provide on their approaches to deliver social, educational, health, or other services. The grant generally requires grantees to evaluate their service models as a condition for the receipt of grant funds.

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## Selected Agencies Have Taken Actions that Align with Congressional and OMB Direction to Strengthen Evidence-Building

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### Selected Agencies Implemented Evidence-Based Approaches in Response to Congressional Direction

The selected agencies incorporated evidence-based approaches, such as tiered evidence grants (see sidebar), into their program design and implementation in response to direction from Congress.<sup>22</sup> For example, the Patient Protection and Affordable Care Act established a tiered evidence grant approach for the Department of Health and Human Services' (HHS) Maternal, Infant, and Early Childhood Home Visiting (MIECHV) program in March 2010.<sup>23</sup> The program provides health, social, and child developmental services to pregnant women and families through home visits.<sup>24</sup> The majority of MIECHV program funds are to be spent on home visiting models with sufficient evidence of their effectiveness.<sup>25</sup>

**Tiered evidence grants** seek to incorporate evidence of effectiveness into grant making. Federal agencies establish tiers of grant funding based on the level of evidence grantees provide on their approaches to deliver social, educational, health, or other services. Grantees generally are required to evaluate their service models as a condition for the receipt of grant funds.

Source: [GAO-16-818](#) | GAO-20-119

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<sup>22</sup>Appendix III identifies additional examples of the selected agencies implementing evidence-based approaches. In a July 2013 memorandum, OMB noted that, among other things, evidence-based approaches could be used to test new approaches to service delivery, and help agencies identify new ways to improve results or reduce costs. See OMB, *Next Steps in the Evidence and Innovation Agenda*, OMB Memorandum M-13-17 (Washington, D.C.: July 26, 2013).

<sup>23</sup>Pub. L. No. 111-148, § 2951, 124 Stat. 119, 334–343 (Mar. 23, 2010).

<sup>24</sup>Within HHS, this program is jointly administered by the Health Resources and Services Administration and the Administration for Children and Families. We previously examined this and other tiered evidence grant programs. See GAO, *Tiered Evidence Grants: Opportunities Exist to Share Lessons from Early Implementation and Inform Future Federal Efforts*, [GAO-16-818](#) (Washington, D.C.: Sept. 21, 2016).

<sup>25</sup>42 U.S.C. § 711(d).

To support this requirement, the program incorporated activities across each element of the evidence-building cycle. For example, through its Home Visiting Evidence of Effectiveness review, HHS annually assesses existing evidence about the effectiveness of new and existing home visiting models to identify those that meet criteria for inclusion in the program. The most recent review, in October 2018, identified 20 models that met HHS's criteria for an evidence-based early childhood home visiting model. Of those, HHS determined that 18 models were eligible for MIECHV grantees to select for implementation.<sup>26</sup> In addition, based on statutory requirements, officials prioritized the generation of new evidence to assess the program's results in certain areas, including child health and development, and child maltreatment. The program generated this evidence through program evaluations assessing both program implementation and results. For example, an impact evaluation of four home visiting models published in January 2019 found that these models may reduce household aggression.<sup>27</sup> Because child abuse has been shown to be associated with negative long-term outcomes, reducing household aggression could benefit children as they grow older.

In another example of the use of tiered evidence, the Department of Labor's (DOL) Workforce Innovation Fund, established in 2011, intends to generate long-term improvements in the performance of the public workforce system.<sup>28</sup> The fund established and funded projects in three different tiers:

1. those that proposed new and untested approaches, with little or no evidence of effectiveness;
2. those with promising approaches that were tested and existing evidence suggested could be effective; and
3. those that adapted proven approaches, supported by ample and robust evidence.

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<sup>26</sup>HHS officials told us that, subsequent to the October 2018 review, changes to two models made them no longer eligible for grantees to select for implementation.

<sup>27</sup>Michalopolous, Charles, et. al. *Impacts on Family Outcomes of Evidence-Based Early Childhood Home Visiting: Results from the Mother and Infant Home Visiting Program Evaluation*, OPRE Report 2019-07(Washington, D.C.: Office of Planning, Research, and Evaluation, Administration for Children and Families, Department of Health and Human Services, January 2019).

<sup>28</sup>Department of Defense and Full-Year Continuing Appropriations Act, 2011, Pub. L. No. 112-10, 125 Stat. 38, 155 (Apr. 15, 2011).

To further build DOL's base of evidence on the effectiveness of evidence-based approaches, it required grantees to plan for third-party evaluations of their programs.

During the first grant round in 2012, the Workforce Innovation Fund awarded 26 grants, including one for approximately \$1.4 million in tier one funding to the Pasco-Hernando Workforce Board in Florida. This grant supported making one-stop services, such as employment workshops and workforce program orientations, more accessible to job seekers by providing online access. In addition, the grant supported offering virtual case management and business services through a call-in Employment Support Center to individuals who found it difficult to access these services in person. According to a 2016 case study of this project conducted by DOL, users of the online one-stop accessed services nearly twice as much during this 3-year grant period when compared to the prior 3-year period.<sup>29</sup> In addition, the case study found there was a 53 percent increase in job placements during this 3-year grant period.<sup>30</sup>

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<sup>29</sup>Department of Labor, Workforce Innovation Fund, *Pasco-Hernando Workforce Innovation Fund Project* (Mar. 30, 2016).

<sup>30</sup>Our April 2017 report on performance partnerships identified additional instances in which agencies sought to test new approaches and build evidence about their effectiveness. See, for example, information about the Ysleta del Sur Pueblo tribe's performance partnership pilot in GAO, *Performance Partnerships: Agencies Need to Better Identify Resource Contributions to Sustain Disconnected Youth Pilot Programs and Data to Assess Pilot Results*, [GAO-17-208](#) (Washington, D.C.: Apr. 18, 2017).

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## Selected Agencies Have Taken Evidence-Building Actions that Align with OMB Direction for Cross-Agency Priority Goal Implementation

The selected agencies' evidence-building activities also aligned with implementation actions outlined by OMB for selected cross-agency priority (CAP) goals.<sup>31</sup> As required by the GPRA Modernization Act of 2010, at least every 4 years, OMB is to coordinate with other agencies to develop and implement CAP goals.<sup>32</sup> Two current CAP goals, established in March 2018 in the President's Management Agenda, place a particular focus on evidence-building activities.<sup>33</sup>

**Leveraging data as a strategic asset.** OMB and agency efforts to implement this goal included developing a long-term, enterprise-wide federal data strategy to better govern and leverage the federal government's data. Published in June 2019, this strategy established 10 principles and 40 practices intended to leverage the value of federal data assets while protecting security, privacy, and confidentiality.<sup>34</sup> Officials at each of the five selected agencies described actions taken by their agencies that aligned with the federal data strategy's principles and practices.

For example, the Department of Education (Education) took actions related to the strategy's practice to "convey insights from data." This practice encourages agencies to use a range of communication tools and techniques to effectively present insights from data to a broad set of audiences. In 2016, Education's Office of English Language Acquisition

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<sup>31</sup>OMB provides direction to implement CAP goals in two ways. First, in its role coordinating CAP goals overall, OMB provides general guidance for their implementation (see OMB Cir. No. A-11, at § 220 (2019)). Second, OMB officials serve as goal leaders for individual CAP goals, providing more detailed direction and guidance to agencies contributing to those efforts.

<sup>32</sup>31 U.S.C. § 1120(a). OMB is also required to coordinate with agencies to develop annual federal government performance plans to define, among other things, the level of performance to be achieved toward the CAP goals. 31 U.S.C. § 1115(a).

<sup>33</sup>Appendix II provides additional information on CAP goals.

<sup>34</sup>OMB, *Federal Data Strategy – A Framework for Consistency*, OMB Memorandum M-19-18 (Washington, D.C.: June 4, 2019). The strategy and its related principles, practices, and draft action plan are available at <https://strategy.data.gov>. Last accessed on September 11, 2019. Although the final strategy was not published until June 2019, the principles and practices were initially published in June and October 2018, respectively.

**Federal Evidence Clearinghouses**

According to the Office of Management and Budget (OMB), evidence or “what works” clearinghouses are repositories that synthesize evaluation findings in ways that make research more useful to decision makers, researchers, and service organizations. These repositories provide tools for understanding what service models are ready for replication or expansion and disseminating results.

Source: OMB. | GAO-20-119

(OELA) began studying the potential to use a pay for success model to improve results related to early learning for dual-language students, specifically Spanish-speaking children in pre-kindergarten through third grade. Officials told us in September 2018 that preliminary evidence suggested the model could help close the literacy gap for the target population. In addition, officials told us they intended to disseminate the final results to stakeholders to help inform their decision-making about the approach. To do so, Education officials developed a communication plan to share this evidence via the OELA website, its Facebook account, the National Clearinghouse for English Language Acquisition (see sidebar), and a listserv of more than 10,000 recipients, among other means. As of September 2019, this study had not been completed. Therefore Education has not implemented its communication plan.

**Results-oriented accountability for grants.** One of the four strategies for this CAP goal focuses on the achievement of grant program goals and objectives. In October 2019, OMB staff told us that the strategy aims to hold grant recipients accountable for promising performance practices that support the achievement of those goals and objectives while streamlining compliance requirements for those grant programs that demonstrate results. According to the September 2019 quarterly update for this goal, initial efforts for this strategy involved developing performance management processes to help grant-making entities improve their ability to monitor, and ultimately improve, the performance of grantees. The update stated that OMB and the Chief Financial Officers Council completed efforts in fiscal year 2019 that included soliciting information from agencies on their current grants performance management practices and identifying emerging and innovative performance practices.<sup>35</sup> Subsequent efforts for this goal involved hosting monthly grants practitioner sessions (called Innovation Exchange Sessions) to share new ideas and approaches to grants management, which began in May 2019. The September 2019 session focused on data-driven decision-making for grants.

We identified actions that each of the selected agencies took, aligned with the intent of this CAP goal, to better assess the performance of their grant programs. Officials at each agency told us that they took steps to further incorporate evidence-building requirements into their grant programs. They told us they did this based in part on their experiences in

<sup>35</sup>Officials from Education told us that staff contributed to the working group for this effort.

implementing the evidence-based approaches, such as the tiered evidence grants described earlier in this report.<sup>36</sup>

For example, officials at the Corporation for National and Community Service (CNCS) described their incorporation of evidence-building requirements into the agency's AmeriCorps State and National program.<sup>37</sup> Agency officials told us that grantees have been required to evaluate their programs since 2005. In recent years, CNCS embedded the evidence generated by these evaluations into their grant-making activities. For instance, its grant announcement for 2019 stated that AmeriCorps State and National applications would be scored, in part, based on the reported empirical evidence supporting the applicants' proposed projects.<sup>38</sup> In addition, the announcement required applicants proposing projects in the education focus area to choose one of 13 models that had previously demonstrated effectiveness. According to CNCS officials, this was based on evidence generated in previous projects supported by AmeriCorps State and National grants or CNCS's Social Innovation Fund.<sup>39</sup>

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<sup>36</sup>Appendix III provides additional examples of evidence-based approaches.

<sup>37</sup>Established in 1993 along with the creation of CNCS, this grant program provides funds to nonprofit, public, and other organizations to address community needs across six focus areas. The six focus areas are (1) disaster services, (2) economic opportunity, (3) education, (4) environmental stewardship, (5) healthy futures, and (6) veterans and military families.

<sup>38</sup>Corporation for National and Community Service, *Notice of Federal Funding Opportunity: 2019 AmeriCorps State and National Grants* (Washington, D.C.: Sept. 21, 2018).

<sup>39</sup>See [GAO-16-818](#) for additional information about CNCS's Social Innovation Fund.

## Selected Agencies' Component Organizations and Programs Developed Learning Agendas Aligned with OMB Guidance

Although the Evidence Act's requirements apply to the agency-wide level, OMB's guidance strongly encourages lower-level organizations within agencies to develop and implement their own learning agendas (see side bar).<sup>40</sup> We found instances where officials developed learning agendas at lower organizational levels within several of the selected agencies prior to the issuance of the June 2019 OMB guidance.<sup>41</sup> These learning agendas covered individual component agencies, bureaus, offices, and programs.

### Learning Agendas

According to Office of Management and Budget (OMB) guidance for implementing the Evidence Act, a learning agenda is to define and prioritize relevant questions and identify strategies for building evidence to answer them. In developing a learning agenda, an agency should involve key leaders and stakeholders, to help (1) meet their evidence needs for decision-making and (2) coordinate evidence-building activities across the agency.

Source: OMB. | GAO-20-119

For example, from September 2016 to June 2017, the U.S. Agency for International Development (USAID) conducted a landscape analysis of learning agendas, in which officials identified 15 documented, office-, bureau-, or initiative-wide learning agenda processes at different stages of development within USAID.<sup>42</sup> This included an office-wide learning agenda developed by the Center of Excellence on Democracy, Human Rights, and Governance (DRG). According to USAID, DRG seeks to elevate and integrate democracy, human rights, and governance issues within USAID's overall development portfolio.<sup>43</sup> According to DRG's 2017 learning agenda, its development was informed by ongoing DRG

<sup>40</sup>M-19-23. OMB's guidance describes a learning agenda as a long-term plan that is to take a systematic approach to identifying and addressing policy questions relevant to an agency's programs, policies, and regulations. Developed in consultation with stakeholders, the plan is also to describe the data, methods, and analytical approaches that will be used to develop evidence. This requirement applies to 24 major federal agencies, including Education, HHS, DOL, and USAID. The guidance further states that learning agendas developed at lower organizational levels could tie into and be consistent with the agency-wide agenda, but are not limited by it.

<sup>41</sup>Prior to its June 2019 guidance, OMB had highlighted and encouraged agencies' development of learning agencies in memorandums and other documents, such as the Budget of the United States Government, for several years. For example, a July 2013 memorandum about efforts to strengthen agencies' abilities to generate and use evidence announced a series of workshops, including one in September 2013 that covered the development of learning agendas at DOL. In addition, the development of learning agendas is included in the implementation plans for the leveraging data as a strategic asset CAP goal and in the President's Management Agenda.

<sup>42</sup>USAID, *Landscape Analysis of Learning Agendas* (Washington, D.C.: May 2018).

<sup>43</sup>USAID, "Center of Excellence on Democracy, Human Rights and Governance," *Who We Are*, (May 7, 2019), accessed August 16, 2019, <https://www.usaid.gov/who-we-are/organization/bureaus/bureau-democracy-conflict-and-humanitarian-assistance/center>.

research and evaluation efforts, and consultations with a range of internal stakeholders, including USAID staff from other bureaus and missions. The learning agenda included a set of 11 questions across five thematic areas, as illustrated in figure 3.

Figure 3: Example of Learning Agenda Themes and Questions

DRG THEME	2017 DRG LEARNING AGENDA QUESTIONS	
 <p><b>Participation &amp; Inclusion</b></p>	<ol style="list-style-type: none"> <li>1. What are the most effective civic engagement/ participation strategies for maintaining and creating political space in restrictive environments, including closing spaces and violence-affected societies? What strategies then result in participation becoming habitual?</li> <li>2. What are the effects of various kinds of external DRG support on the success of social movements? Under</li> </ol>	<p>what conditions is such support helpful in achieving these movements' stated goals?</p> <ol style="list-style-type: none"> <li>3. How do differences in electoral systems affect conflict dynamics, and how can we use that knowledge to develop more conflict-sensitive elections programming?</li> </ol>
 <p><b>Transparency &amp; Accountability</b></p>	<ol style="list-style-type: none"> <li>1. Does the introduction of e-governance (e.g. computerized case management) improve the performance of, and increase public confidence in, public institutions—e.g., the justice system?</li> </ol>	<ol style="list-style-type: none"> <li>2. When a government sets up separate institutions in the justice sector that address gender-based violence (e.g. police units, prosecutors, courts), what are the implications for both the victims' access to justice and the mitigation of harm to victims?</li> </ol>
 <p><b>Human Rights</b></p>	<ol style="list-style-type: none"> <li>1. In what ways are human rights awareness campaigns successful and what are their unintended negative consequences?</li> <li>2. What are the drivers of radicalization? How do violations of human rights and rule of law lead to radicalization?</li> </ol>	<ol style="list-style-type: none"> <li>3. To what extent does targeting marginalized groups for DRG assistance have spillover or multiplier effects on DRG outcomes among untargeted groups?</li> </ol>
 <p><b>DRG Integration</b></p>	<ol style="list-style-type: none"> <li>1. When PITA principles (participation, inclusion, transparency and accountability) are introduced into non-DRG programming, how do outcomes in other sectors change?</li> </ol>	<ol style="list-style-type: none"> <li>2. How and under what circumstances can citizen engagement in community decision-making, advocacy, and monitoring influence reforms at higher levels of government? And how does this vary across sectors?</li> </ol>
 <p><b>Theories of Democratic Change</b></p>	<ol style="list-style-type: none"> <li>1. What factors explain momentary openings and lasting liberalization of authoritarian systems, short of regime change? To what extent do institutional,</li> </ol>	<p>cultural, geographic, and other conditions shape the paths away from authoritarianism?</p>

Source: United States Agency for International Development (USAID) Center of Excellence on Democracy, Human Rights, and Governance (DRG) Learning Agenda 2017. | GAO-20-119

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DRG outlined steps it planned to take throughout 2017 to address each question, such as assessing existing evidence, identifying any gaps, and conducting new research and evaluation activities to fill those gaps. For example, DRG commissioned a study to help answer a question about the effects of human rights awareness campaigns. The study, published in September 2017, synthesized the results of a literature review to identify (1) characteristics of effective campaigns, and (2) typical causes of unintended negative consequences of human rights awareness campaigns and ways to avoid them.<sup>44</sup>

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## Selected Agencies Established Processes to Coordinate Fragmented Evidence-Building Activities, but Processes to Prioritize New Evidence Did Not Always Reflect Leading Practices

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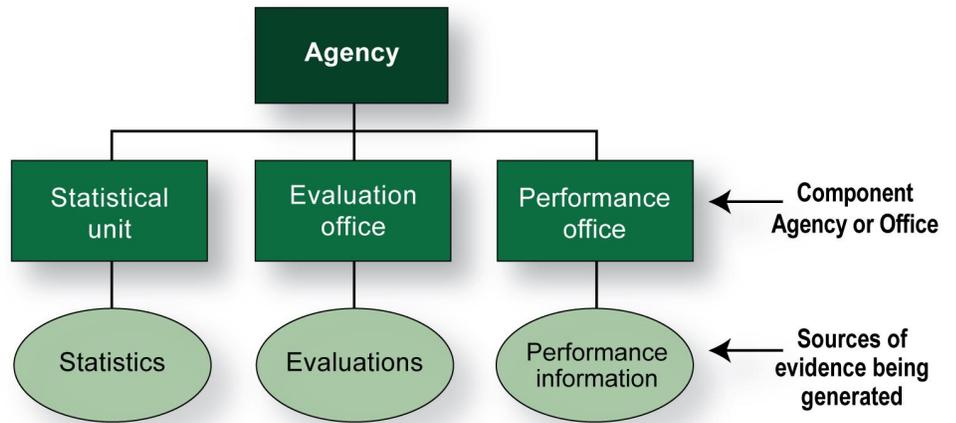
### Selected Agencies Established Processes to Coordinate Fragmented Evidence-Building Activities

We found that evidence-building activities are fragmented within each of the five selected agencies and occur at multiple levels and entities within and across the agencies. As illustrated in figure 4, this fragmented approach to evidence-building includes separate component agencies or offices with responsibilities for building specific sources of evidence, such as performance information, evaluations, and statistical data.

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<sup>44</sup>Boyle, Elizabeth Heger, et. al. *Making Human Rights Campaigns Effective While Limiting Unintended Consequences: Lessons from Recent Research* (University of Minnesota, September 2017).

**Figure 4: Illustrative Example of Fragmented Evidence-Building Activities**

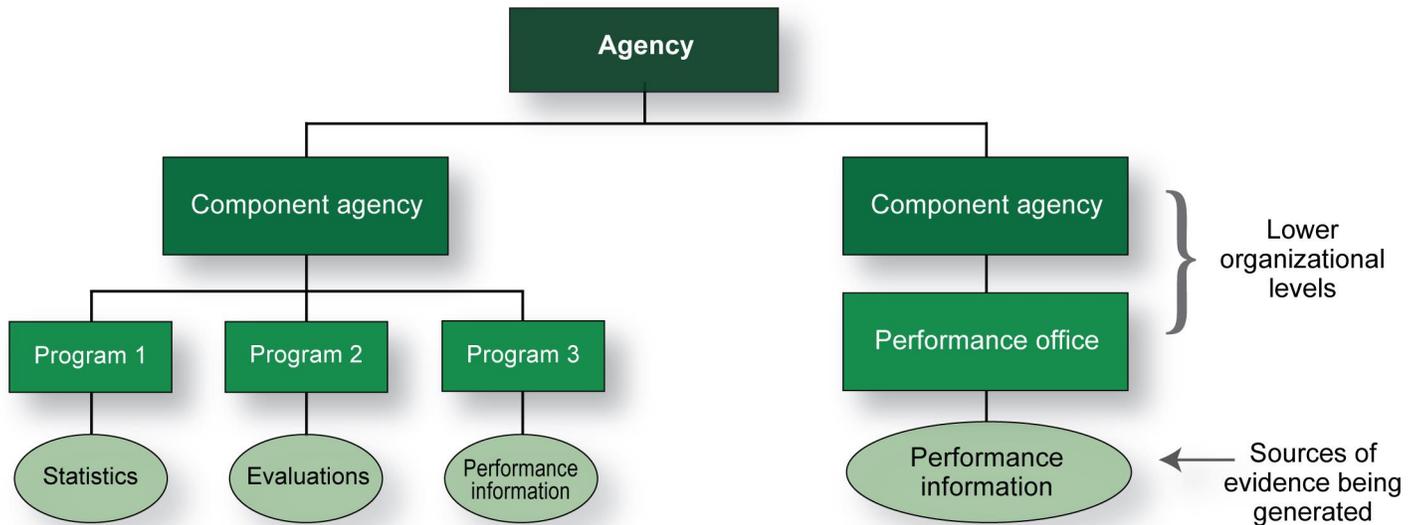


Source: GAO analysis of information from selected agencies' websites. | GAO-20-119

For example, at the Department of Labor (DOL), different organizations at the department level are responsible for certain evidence-building activities. This includes the Bureau of Labor Statistics (collecting statistical data), Office of the Chief Evaluation Officer (conducting program evaluations) and Performance Management Center (developing performance information).

In addition, some evidence-building activities are dispersed throughout agencies and occur at multiple organizational levels (see figure 5).

**Figure 5: Illustrative Example of Evidence-Building Activities at Multiple Organizational Levels**



Source: GAO analysis of information from selected agencies' websites. | GAO-20-119

For example, at the Department of Health and Human Services (HHS), evidence-building activities are generally managed at the component agency level (referred to as divisions). The divisions manage their own offices and programs, which include evidence-building responsibilities. For instance, within the Administration for Children and Families (ACF), an operating division within HHS—the Office of Planning, Research, and Evaluation—is responsible for ACF-related evidence-building activities. These activities include program evaluations, research syntheses, descriptive and exploratory studies, data analyses, and performance management activities.<sup>45</sup>

Officials at the selected agencies said that evidence-building activities are fragmented and occur at lower levels for a variety of reasons.<sup>46</sup> First, this approach helps ensure that decision makers at different levels within the organization have the evidence they need to inform decisions. Second,

<sup>45</sup>Similarly, in January 2019, we identified organizations within Education—at the department and program levels—with evidence-building responsibilities. See GAO, *K-12 Education: Challenges to Assessing Program Performance and Recent Efforts to Address Them*, [GAO-19-266R](#) (Washington, D.C.: Jan. 31, 2019).

<sup>46</sup>Although these activities occur at lower organizational levels, they may be conducted in conjunction with officials with agency-wide evidence-building responsibilities, such as those in agency evaluation or performance management offices.

officials stated that many times these evidence-building activities have been undertaken in response to direction from Congress—for example, through provisions in laws or related committee reports directed at a component agency or program. Third, agency officials said they have undertaken these activities based on OMB direction, such as memorandums or budget guidance. This has encouraged agencies to take actions at different organizational levels.

However, each of the selected agencies had established processes for coordinating their evidence-building activities. For example, officials at each agency established one or more processes intended to regularly coordinate the assessment and prioritization of evidence needs across the agency, as described later in this report.

Agency officials also described other efforts to coordinate evidence-building activities, but these efforts were either ad hoc (i.e., they did not occur regularly) or not comprehensive in nature (i.e., they did not focus broadly across different sources of evidence or did not cover the entire agency).<sup>47</sup> For example, in August 2017, the Corporation for National and Community Service (CNCS) published the results of an assessment of existing evidence—results from research and evaluation activities conducted between fiscal years 2015 and 2016—in its *State of the Evidence* report. However, CNCS has not conducted a similar analysis or issued a similar report since that time. Moreover, the assessment did not cover all of the agency’s activities. While the report included evidence related to its programs, CNCS did not assess evidence related to other activities, such as internal management functions including information technology or human capital management.

We identified instances in which effective coordination helped selected agencies better manage their fragmented evidence-building activities. For example, the U.S. Agency for International Development (USAID) developed an agency-wide Private Sector Engagement learning agenda, published in May 2019. This learning agenda is intended to guide and coordinate crosscutting efforts to develop evidence of effective approaches for engaging the private sector to help partner countries meet development goals and ultimately move beyond the need for foreign assistance. This learning agenda includes establishing performance

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<sup>47</sup>Appendix IV provides illustrative examples of these additional collaborative evidence-building efforts identified by agency officials.

measures to monitor progress on engagement with the private sector, and further evaluate the results of its activities. The coordinated evidence-building approach established by this learning agenda can help USAID better focus limited resources on building new evidence in this crosscutting area for use across the agency, thereby reducing any unwarranted overlap or duplication of effort.

Effectively-coordinated processes can help agencies ensure they are comprehensively and systematically looking across their organizations to leverage their existing evidence and focus limited resources on building new evidence. They can also help agencies manage their fragmented evidence-building activities to improve effectiveness and reduce the potential for any unwarranted overlapping or duplicative efforts. Such processes can help ensure agencies are well positioned to meet forthcoming Evidence Act requirements related to assessing and prioritizing evidence across the entire agency.

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## Selected Agencies Use Similar Approaches to Assess Evidence Needs That Reflect Leading Practices for Collaboration

### Selected Agencies Established Similar Approaches to Assess Existing Evidence

Each of the five selected agencies established a similar approach for assessing existing evidence and identifying gaps or other evidence needs across the agency. Agency officials said that these approaches responded to OMB guidance for agencies to conduct annual strategic reviews. Specifically, in its guidance for implementing the GPRA Modernization Act of 2010, OMB established an annual process in which each agency is to review progress in achieving strategic objectives—goals that reflect the outcome or impact the agency is seeking to achieve—established in its strategic plan.<sup>48</sup> According to OMB’s guidance, as a part of those reviews, the assessment of existing evidence

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<sup>48</sup>The guidance directs agencies to assess existing sources of evidence to understand the progress made toward each strategic objective and identify where additional evidence is needed to determine effectiveness. See OMB, Cir. No. A-11, at §§ 260.9 and 260.11 (2019). We conducted the majority of our audit work prior to the release of the 2019 version of Circular A-11. However, the provisions related to strategic reviews are substantively the same as the 2018 version. Therefore, we cite to the 2019 version of the document in this report for ease of accessibility.

should inform agency decisions about where to focus limited available resources to build new evidence to fulfill any identified needs.

OMB's guidance encourages agencies to leverage existing decision-making processes, such as the budget development process, to implement these reviews.<sup>49</sup> Each of the five selected agencies conducts strategic reviews and associated evidence assessments in similar ways, through a variety of existing decision-making processes:

- CNCS and HHS use their budget formulation processes;
- Education incorporates strategic objective reviews into existing quarterly reviews of progress in meeting goals;
- DOL uses a stand-alone strategic review process; and
- USAID leverages an existing review process conducted at lower levels (i.e., its missions).

Officials at selected agencies identified instances in which they used their agency strategic reviews to (1) assess a variety of existing sources of evidence—a portfolio of evidence—to determine progress toward a strategic objective, and (2) identify the need for additional evidence, as illustrated by the following examples.

- **Assessing a portfolio of evidence.** DOL's guidance for its strategic review process directs its component agencies to assess a variety of evidence sources to determine results and risks or challenges that may affect future outcomes. This includes performance information, program evaluations, risk assessments, and findings from reports by us and the department's Office of Inspector General (OIG), among other sources. In its fiscal year 2018 Annual Performance Report, DOL identified different sources of evidence to demonstrate the effectiveness of some of its programs, and challenges related to others, for its strategic objective to create customer-focused workforce solutions for American workers.<sup>50</sup> For example, it cited statistics and performance data to provide context and some quantitative results related to this objective. It also shared the results from several program evaluations, including a 2017 impact evaluation that

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<sup>49</sup>OMB Cir. No. A-11, at §§ 260.12 (2019).

<sup>50</sup>Department of Labor, *Fiscal Year 2018 Annual Performance Report* (Washington, D.C.: March 2019).

suggested DOL's Adult and Dislocated Worker programs were effective at increasing participants' earnings and employment.<sup>51</sup>

DOL's performance report also highlighted that its OIG identified aspects of several programs that support this objective as Top Management and Performance Challenges for Fiscal Year 2018.<sup>52</sup>

One of those challenges related to maintaining the integrity of Foreign Labor Certification Programs. DOL's performance report stated that balancing the quality review of applications with employers' needs for timely processing has been a challenge for years. Based on the totality of evidence, DOL identified this strategic objective as a focus area for improvement for fiscal year 2018.<sup>53</sup>

- **Identifying evidence needs.** In its *Strategic Plan for Fiscal Years 2018-22*, Education established a strategic objective to increase high-quality education options and empower students and parents to choose an option that meets their needs.<sup>54</sup> To implement this strategic objective, the strategic plan states that the department will encourage state and local education agencies to expand school choice by administering programs that increase education options, such as the Charter Schools Program (CSP). One of the performance measures Education uses to assess the program and progress on this strategic objective is the aggregate number of charter schools that are open, operating, and supported by CSP.

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<sup>51</sup>Fortson, Kenneth, et al. *Providing Public Workforce Services to Job Seekers: 30-month Impact Findings on the WIA Adult and Dislocated Worker Programs* (Washington, DC: Mathematica Policy Research, 2017).

<sup>52</sup>Department of Labor, Office of Inspector General, *Top Management and Performance Challenges Facing the U.S. Department of Labor* (Washington, D.C.: November 2018).

<sup>53</sup>OMB guidance directs agencies to conduct a relative assessment of progress across all strategic objectives during the strategic review process. As part of their reporting, agencies are to identify a portion of their objectives as (1) having demonstrated noteworthy progress and (2) focus areas for improvement. OMB's guidance directs agencies to identify, in submissions to OMB, between 10 and 20 percent of their objectives in each of the two categories. According to the guidance, this is to ensure that OMB and each agency are able to discuss relative performance across the organization's mission and prioritize analysis and decision-making. It further states that those initially identified in these two categories may not ultimately be identified as such when published on Performance.gov. OMB Cir. No. A-11, at §§ 260.15 and 260.18 (2019).

<sup>54</sup>Department of Education, *Strategic Plan for Fiscal Years 2018-22* (Washington, D.C.: Feb. 12, 2018).

Education officials told us that they identified limitations with this measure through the department's strategic review process, and the need for additional evidence. As an aggregate count, the measure did not allow the department to accurately identify underlying changes in individual charter schools served by the program or the results and activities of CSP. For example, Education officials set a goal to increase the number of CSP-supported charter schools by 150 for the 2017-2018 school year.<sup>55</sup> However, Education reported a decrease of four charter schools for this time period. To better understand CSP's performance, Education officials told us they needed additional evidence to assess other aspects of the program's performance.

Education officials identified additional sources of evidence within the department that they could use to understand the program's performance. These included statistics from Education's National Center for Education Statistics (NCES) on the total number of charter schools that opened and closed over the same time period, and annual performance reports from grantees. According to information on Performance.gov, these additional sources of information showed that, in the 2017-2018 school year, 134 new charter schools supported by CSP opened, and 101 charter schools expanded under a CSP grant.

These actions illustrate an instance of effective coordination of evidence-building activities to manage fragmentation and reduce the risk of duplication. Education officials looked across the agency and leveraged existing evidence generated by different organizational units—CSP and NCES—to better understand program performance. Had this not occurred, CSP might have collected data that duplicated what was already generated by NCES.

#### Selected Agencies' Processes to Assess Existing Evidence Reflect Leading Practices for Collaboration

Agencies' assessments of the sufficiency of their existing evidence—conducted via processes for their strategic reviews—reflect the four leading collaboration practices. Although OMB's guidance provides

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<sup>55</sup>According to Education's fiscal year 2018 performance report, the department established a target of 3,749 CSP-supported charter schools for the 2017-2018 school year—an increase of 150 from the prior year total of 3,599 schools. However, as reported by Education, the result for the 2017-2018 school year was 3,595 CSP-supported charter schools—a decrease of four charter schools from the prior year.

flexibility in how the reviews are conducted, it also sets specific expectations for who should lead the process, who should participate in the process, and the types of roles and responsibilities for these individuals. Table 1 provides illustrative examples of the selected agencies' evidence assessment processes that reflect leading practices for collaboration.

**Table 1: Examples of Selected Agencies' Evidence Assessment Processes That Reflect Leading Practices for Collaboration**

Leading practice	Illustrative example
<p><b>Leadership</b> A leadership model is identified for the collaborative effort.</p>	<p>The Department of Health and Human Services' strategic review process is led by its Performance Improvement Officer (PIO), supported and coordinated by the Deputy PIO.</p>
<p><b>Participants</b> Relevant participants have been identified and included.</p>	<p>The Department of Education's strategic review meetings are chaired by the Deputy Secretary and involve, among others, the PIO; goal leaders—individuals assigned responsibility for each goal and objective; members of goal teams; and officials from functional management offices, such as the Chief Financial Officer and the Chief Human Capital Officer.</p>
<p><b>Roles and Responsibilities</b> Roles and responsibilities are defined and agreed upon.</p>	<p>The Corporation for National and Community Service's offices are responsible for preparing budget scenarios that describe the evidence that supported their programs. The Budget Office organizes budget hearings, during which staff and agency leadership discuss how evidence supports the scenarios. The agency's Chief Executive Officer, in consultation with other agency leaders, makes final budget decisions based, in part, on the evidence discussed.</p>
<p><b>Written Guidance and Agreements</b> Key aspects of collaborative activities are documented.</p>	<p>The Department of Labor's (DOL) Chief Operating Officer issues a memorandum to all strategic review participants that establishes key expectations and time frames for the strategic review process. In addition, DOL's Performance Management Center, which coordinates the process, provides technical guidance for completing a "findings table"—a standard template for identifying and assessing evidence related to each strategic objective. This includes criteria to conduct this assessment, such as the types of evidence that are likely appropriate.</p>

Source: GAO analysis of agency information. | GAO-20-119

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## Some Agency Processes to Prioritize New Evidence to Generate Reflect Leading Practices for Collaboration

### Selected Agencies Established a Range of Processes to Coordinate Evidence Prioritization

Unlike the similar processes they use for assessing existing evidence and identifying needs, the five selected agencies use a variety of processes to prioritize new evidence to generate. Agency officials told us that much of this prioritization takes place at lower organizational levels. For example, at HHS, the department's component agencies—11 operating divisions and 14 staff divisions—generally lead their own evidence-building processes, through which they prioritize which evidence to generate.<sup>56</sup>

Officials from HHS's Office of the Assistant Secretary for Planning and Evaluation told us that this decentralized model is due to the size and complexity of the department, and that it respects the unique needs of the divisions. According to these officials, a 2017 review by this office found variation in the processes that the components use for this purpose. HHS officials said that most components prioritize their evidence needs through their budget formulation processes.

Officials at each of the selected agencies identified one or more processes intended to coordinate the prioritization of evidence needs across the entire organization. Table 2 describes these processes.

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<sup>56</sup>According to HHS, operating divisions administer a wide variety of health and human services and conduct life-saving research for the nation. Staff divisions provide leadership, direction, and policy and management guidance to the department.

**Table 2: Agency-wide Processes for Coordinating the Prioritization of Evidence Needs**

Agency	Description of Processes
<b>Corporation for National and Community Service (CNCS)</b>	<p><b>Budget formulation process.</b> CNCS adapted its budget formulation process to consider how to prioritize evidence needs identified through its evidence assessment at an agency-wide level. Based on their evidence assessments, offices from across the agency are to identify—in their budget proposals—the evidence-building activities they believe are most important to undertake to strengthen the evidence base.</p>
<b>Department of Education (Education)</b>	<p><b>Evidence Leadership Group (ELG).</b> In March 2019, Education established the ELG as a new coordinating mechanism to succeed a predecessor group—the Evidence Planning Group (EPG). Education formed the ELG to meet the new Evidence Act requirements and build on lessons learned from the EPG. The purpose of the ELG is to guide and coordinate the department’s evidence-building activities.</p> <p><b>Evidence Planning Group.</b> Education designed the now-defunct EPG to coordinate evidence-building activities across the department. The EPG worked with department components to identify evaluations to conduct, integrate evidence into grant competitions, and improve the use of performance information. The EPG generally did not make evidence prioritization decisions. Instead it made recommendations on evidence prioritization to relevant Education officials.</p>
<b>Department of Health and Human Services (HHS)</b>	<p><b>Budget formulation process.</b> HHS officials identified the budget formulation process as one way in which they have visibility over evidence-building activities across the entire department. HHS divisions’ budget formulation materials are to include plans to prioritize the development of new evidence—such as evaluations and data collection efforts. HHS leadership reviews division budget requests, discusses policy and program implications with relevant HHS staff, and sets the department’s priorities for evidence-building activities.</p>
<b>Department of Labor (DOL)</b>	<p><b>Learning agendas.</b> DOL directs each component agency to develop its own learning agenda to identify key policy questions and prioritize the most appropriate evidence-building methods through an annual process coordinated by the Office of the Chief Evaluation Officer (CEO). Evidence-building methods include performance measures, administrative data or evaluations that will help answer the policy questions.</p> <p><b>Evaluation plan.</b> DOL also established an agency-wide evaluation plan process for prioritizing evidence needs across its components. DOL’s CEO develops, drafts, publicly releases, and implements this agency-wide evaluation plan. The plan is informed by the priorities identified across component agencies’ learning agendas, departmental and administration priorities, statutory requirements, findings from our reports and those of DOL’s Office of the Inspector General, and available resources.</p>
<b>U.S. Agency for International Development (USAID)</b>	<p><b>Program cycle.</b> Through this process, USAID directs its bureaus and offices to plan, implement, assess, and adapt its programs. As part of the program cycle, the agency’s operating units are to prioritize a portfolio of evidence-building activities—including performance indicators, evaluations, and other research—to support their strategies, programs, and activities; help them make course corrections; and inform future programming.<sup>a</sup></p> <p><b>Agency-wide learning agenda.</b> USAID also developed learning agendas to collect, synthesize, and disseminate evidence to inform agency-wide efforts. For example, in May 2019, USAID released a set of Self-Reliance learning agenda questions to make progress toward its agency-wide vision of helping partner countries achieve self-reliance. It also prioritized evidence-building activities, such as literature reviews and evaluations to answer the questions.</p>

Source: GAO analysis of agency information. | GAO-20-119.

<sup>a</sup>In July 2019, as part of assessing implementation of the Foreign Assistance Accountability and Transparency Act of 2016, we examined USAID’s policies for monitoring performance and evaluating outcomes and impacts of its programs, including its program cycle. We found that USAID took steps

to implement those policies, which incorporated key aspects of OMB's guidelines for implementing the act's requirements. See GAO, *Foreign Assistance: Federal Monitoring and Evaluation Guidelines Incorporate Most but Not All Leading Practices*, [GAO-19-466](#) (Washington, D.C.: July 31, 2019).

We identified instances in which officials used these processes to more effectively focus limited resources to build new evidence through coordination across the agency. For example, CNCS officials described an instance in which agency leadership used the agency's budget formulation process to prioritize evidence-building activities to address knowledge gaps about the AmeriCorps National Civilian Community Corps (NCCC) program.<sup>57</sup> According to CNCS officials, through the agency's evidence assessment processes, they found that the agency did not have evidence to fully assess the impact of NCCC programs on members and communities.

Moreover, existing evidence showed that NCCC had experienced a decline in the number of qualified applicants and the retention of its members since 2014. To better understand the performance and results of this program, CNCS officials told us that agency leadership approved funding in fiscal years 2018 and 2019 for NCCC to undertake a multi-year impact evaluation. This evaluation, which is being conducted in conjunction with CNCS's Office of Research and Evaluation and an independent contractor, is expected to examine the member retention, leadership development, and community impact of NCCC programming.<sup>58</sup>

Officials at each of the selected agencies told us that they were considering how best to meet Evidence Act requirements to take a systematic and coordinated approach to prioritizing evidence-building activities, such as through learning agendas.<sup>59</sup> For example, as described in table 3, Education created a new body in March 2019—the Evidence Leadership Group—to coordinate its evidence-building activities. Education officials told us that in establishing this new group, they took into consideration our leading practices for collaboration.

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<sup>57</sup>NCCC is a national service program that aims to develop leaders and strengthen communities by deploying AmeriCorps members to respond to natural disasters, build homes for low-income families, and perform environmental clean-up.

<sup>58</sup>As of June 2019, CNCS and its contractor had completed the planning phase for this particular evaluation.

<sup>59</sup>5 U.S.C. § 312. The Evidence Act requirements for evidence-building plans (learning agendas) apply to 24 major federal agencies, including DOL, Education, HHS, and USAID. 5 U.S.C. § 311(1); 31 U.S.C. § 901(b). Although that requirement does not apply to CNCS, OMB's guidance strongly encourages other agencies to develop learning agendas. OMB, M-19-23 (2019).

Evidence Prioritization Processes at Four Agencies Reflect Leading Practices for Collaboration to Varying Extents

**Leadership**

As described in table 3, all five selected agencies identified one or more leadership models for their evidence prioritization processes.

**Table 3: Selected Agencies’ Evidence Prioritization Processes Established Leadership Models**

**Leading practice: A leadership model is identified for the collaborative effort.**

Agency	Extent to which actions reflect leading practice	Explanation
<b>Corporation for National and Community Service (CNCS)</b>	Reflects	The Budget Office leads the budget formulation process. The agency’s Chief Executive Officer has responsibility for making final decisions on budget proposals based on the strength of evidence supporting them.
<b>Department of Education (Education)</b>	Reflects	The charter for the Evidence Leadership Group, which was established in March 2019, states that it is co-led by Education’s Evaluation Officer—the Commissioner of the National Center for Education Evaluation and Regional Assistance within the Institute of Education Sciences (IES)—and the Office of Planning, Evaluation and Policy Development (OPEPD). For the now-defunct Evidence Planning Group, three evidence-building organizations within Education shared leadership: (1) OPEPD, which continues to oversee planning, evaluation, and policy development; (2) IES, which continues to provide statistics and conduct research and evaluations for the department; and (3) the former Office of Innovation and Improvement (now merged into the Office of Elementary and Secondary Education), which was responsible for identifying, developing, and scaling grant programs by investing in innovative educational programs and practices.
<b>Department of Health and Human Services (HHS)</b>	Reflects	According to HHS officials, the Assistant Secretary for Financial Resources/Performance Improvement Officer leads the department’s budget formulation process.
<b>Department of Labor (DOL)</b>	Reflects	The Office of the Chief Evaluation Officer leads the agency’s learning agenda process by collaborating with and supporting component agencies in their development of learning agendas. It also leads the development of DOL’s annual evaluation plan.
<b>U.S. Agency for International Development (USAID)</b>	Reflects	The Bureau for Policy, Planning and Learning (PPL) leads USAID’s program cycle and learning agenda processes. For the program cycle, PPL establishes policies and co-leads the country strategic planning process. PPL also facilitates information sharing related to the learning agenda development process. Along with USAID’s Global Development Lab, PPL led the development of the agency-wide Self-Reliance learning agenda.

Source: GAO analysis of agency information. | GAO-20-119.

Note: Reflects = Actions reflect all aspects of this leading practice.

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## Participants

We found that all five of the selected agencies involved at least some relevant participants in their evidence prioritization processes, as summarized in table 4. Our past work related to evidence-building activities identified a wide range of relevant participants to involve.<sup>60</sup> Within agencies, these participants include agency leadership, program staff, and those with functional management responsibilities including budget, human capital, and information technology. External stakeholders include Congress, other federal agencies, state and local governments, grant recipients, and regulated entities.

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<sup>60</sup>See, for example, [GAO-15-602](#); GAO, *Managing for Results: Data-Driven Performance Reviews Show Promise But Agencies Should Explore How to Involve Other Relevant Agencies*, [GAO-13-228](#) (Washington, D.C.: Feb. 27, 2013); *Managing for Results: A Guide for Using the GPRA Modernization Act to Help Inform Congressional Decision Making*, [GAO-12-621SP](#) (Washington, D.C.: June 25, 2012); and *Executive Guide: Effectively Implementing the Government Performance and Results Act*, [GAO/GGD-96-118](#) (Washington, D.C.: June 1996).

**Table 4: Extent to Which Selected Agencies' Evidence Prioritization Processes Involved Relevant Participants**

**Leading Practice: Relevant participants, internal and external to the agency, have been identified and included.**

Agency	Extent to which actions reflect leading practice	Explanation
Corporation for National and Community Service (CNCS)	Partially reflects	<p>Internal budget hearings, during which evidence needs are prioritized, involve agency leadership, program management and staff, and some functional offices. However, each hearing does not always involve others who could be key to prioritizing evidence and related resources, such as the Director of the Office of Research and Evaluation or other management officials (e.g., Chief Human Capital Officer).</p> <p>CNCS officials described ad hoc approaches they used to collect and consider input from some external stakeholders, such as feedback from researchers at conferences. However, the agency has not established a mechanism to systematically obtain and integrate external stakeholder perspectives on evidence priorities into the budget hearings, which are an internal process.</p>
Department of Education (Education)	Reflects	<p>The charter for the Evidence Leadership Group (ELG)—which was established in March 2019 to succeed the Evidence Planning Group (EPG)—identifies a range of internal and external stakeholders to involve in its work, which includes setting evidence priorities. It identifies participants from across Education's programmatic and functional management offices. In addition, the charter states that the work of the ELG is to depend on strong partnerships with other federal agencies, states and localities, private sector innovators, and other stakeholders in the education community.</p> <p>For the now-defunct EPG, Education included a range of internal stakeholders, such as program staff, budget officials, and the Performance Improvement Officer. In addition, Education officials told us that the EPG considered the perspective of some external stakeholders—such as researchers. However, the EPG did not engage a broader range of external stakeholders in determining evidence priorities.</p>
Department of Health and Human Services (HHS)	Partially reflects	<p>According to HHS officials, HHS's budget formulation process, during which evidence needs are prioritized across the department, involves department leadership, and leadership and staff from HHS's divisions, including those with evidence-building responsibilities, such as the Assistant Secretary for Financial Resources/Performance Improvement Officer and the Assistant Secretary for Planning and Evaluation.</p> <p>HHS officials described ad hoc approaches they used to collect and consider input from some external stakeholders, such as feedback from researchers at conferences. However, HHS has not developed a mechanism to systematically obtain and integrate the perspectives of external stakeholders on evidence priorities in its budget formulation process, which is an internal management process.</p>
Department of Labor (DOL)	Partially reflects	<p>DOL's learning agenda and evaluation plan development processes engage internal stakeholders across the department, including department and component agency leaders, program staff, and officials from functional management offices. These processes, however, do not systematically engage or incorporate perspectives from a range of external stakeholders to help understand and prioritize evidence needs. DOL identified approaches it uses to collect and consider perspectives from some external stakeholders, such as external researchers.</p>

Agency	Extent to which actions reflect leading practice	Explanation
U.S. Agency for International Development (USAID)	Reflects	<p>Through its program cycle and learning agenda processes, USAID involves a wide range of internal and external stakeholders in prioritizing evidence needs. As part of the program cycle, operational units are responsible for responding to the priorities and perspectives of external stakeholders, including partner country governments, beneficiaries, civil society, the private sector, and academia. In addition, as part of this cycle, operational units are also responsible for developing plans for collaborating internally.</p> <p>Similarly, USAID engaged a range of internal and external stakeholders during the development of its agency-wide Self-Reliance learning agenda, which was published in May 2019. For example, agency operating units and missions provided feedback on which questions to include in the document. In addition, USAID used different methods to obtain input on the learning agenda from external stakeholders, such as other federal agencies, international organizations, and organizations that implement its programs. This included several events in the summer and fall of 2018 during which USAID solicited external stakeholders' views.</p>

Source: GAO analysis of agency information. | GAO-20-119.

Note: Reflects = Actions reflect all aspects of this leading practice.

Partially reflects = Actions reflect some but not all aspects of this leading practice.

The five selected agencies include a range of relevant internal participants, although the evidence prioritization process at CNCS does not always include key internal stakeholders. CNCS's budget hearings involve discussions about prioritizing evidence, but primarily focus on budget formulation decisions. Therefore, agency leaders and budget officials are consistently involved in the hearings, but others, such as the Director of the Office of Research and Evaluation, are not. Involving all key internal stakeholders helps ensure that those involved in a collaborative effort can commit resources, make decisions, and share their knowledge, skills, and abilities. This can also help ensure that the evidence that will be subsequently generated will be useful to decision makers across the organization.

Education and USAID established expectations to seek input from external stakeholders in their evidence prioritization processes. Education's charter for its recently-established Evidence Leadership Group states that the group is to engage a wide array of external stakeholders in its work. Similarly, for the evidence prioritization activities that occur through USAID's program cycle and learning agendas, related guidance sets expectations to involve or obtain the perspectives of external stakeholders. As USAID developed its Self-Reliance learning agenda, it sought input from external stakeholders including officials from

other federal agencies, organizations that implement USAID programs, and experts in international development, among others.<sup>61</sup>

Three of the selected agencies, however, do not always have mechanisms in place to involve, or consider the evidence needs of, a range of external stakeholders in their evidence prioritization processes. Officials at CNCS, HHS, and DOL told us that, because they consider their prioritization processes to cover internal management purposes and decisions, including external stakeholders is not appropriate.<sup>62</sup> Officials at these three agencies described ways in which they sought input on evidence needs from some stakeholders, such as from interactions with grant recipients and external researchers. However, these agencies have not developed an approach to collect and consider input on evidence needs from all relevant stakeholders to inform their prioritization processes.

Our past work highlights the importance of engaging key external stakeholders, especially Congress, to better understand and meet their evidence needs.<sup>63</sup> Engaging external stakeholders can also create a shared understanding of competing demands facing the agency and ensure that their efforts and resources are targeted at the highest priorities across the agency. Moreover, through this engagement, agencies may find that external stakeholders have, or are aware of, existing evidence that helps the agency meet its needs or provide a fuller picture of performance. Involving a full range of relevant stakeholders in the process for prioritizing new evidence to generate would help each of

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<sup>61</sup>USAID's Self-Reliance learning agenda states that officials plan to continue reaching out to internal and external stakeholders as they begin to generate evidence to address the learning agenda's questions. In addition, the document states that officials will regularly revise the learning agenda's questions and that they will consult internal and external stakeholders in doing so.

<sup>62</sup>Similarly, in March 2019, we found that DOL's process to set research and evaluation priorities for its employment and training programs does not involve key external stakeholders, such as other federal agencies, state and local government officials, and academics. We recommended that DOL consult with key external stakeholders in developing the required multiyear strategic research plan for evaluating those programs. DOL agreed with this recommendation and we will continue to monitor actions to address it. See GAO, *Employment and Training Programs: Department of Labor Should Assess Efforts to Coordinate Services Across Programs*, [GAO-19-200](#) (Washington, D.C.: Mar. 28, 2019).

<sup>63</sup>See, for example, [GAO-12-621SP](#); GAO, *Program Evaluation: Experienced Agencies Follow Similar Model for Prioritizing Research*, [GAO-11-176](#) (Washington, D.C.: Jan. 14, 2011); and [GAO/GGD-96-118](#).

the selected agencies ensure it is meeting the evidence needs of decision makers within and external to the agency.<sup>64</sup>

**Roles and Responsibilities**

Four of the selected agencies—Education, HHS, DOL, and USAID—fully define roles and responsibilities for those involved in their evidence prioritization processes, while the process at CNCS partially reflects this practice, as described in table 5.

**Table 5: Extent to Which Selected Agencies’ Evidence Prioritization Processes Define Roles and Responsibilities**

**Leading practice: Roles and responsibilities, including steps for decision-making, are defined and agreed upon.**

Agency	Extent to which actions reflect leading practice	Explanation
<b>Corporation for National and Community Service (CNCS)</b>	Partially reflects	CNCS established clear roles and responsibilities for some participants involved in prioritizing evidence needs during the budget formulation process. For example, it directs offices to identify priority evidence-building activities in their budget proposals that could help build their evidence base. However, the agency has not defined clear roles or responsibilities for other key participants. For example, CNCS had not specified if, or to what extent, offices should involve the Office of Research and Evaluation to help prioritize evidence-building activities, although that office would likely be involved in generating the subsequent evidence.
<b>Department of Education (Education)</b>	Reflects	<p>The charter for the Evidence Leadership Group (ELG) identifies a series of core ELG responsibilities and which member of the group will lead particular activities. In addition, it states that the co-chairs and executive committee of the ELG will establish working groups for each core activity, and that each working group will be led by one or more ELG members.</p> <p>The charter for the now-defunct Evidence Planning Group (EPG) stated that the EPG worked with Education’s component agencies and offices on a range of evidence-building activities, such as identifying new evaluations and supporting the collection and use of performance information. Beyond that, however, it did not specify the roles and responsibilities of the different organizations, such as who from EPG and the component agencies should have been involved, what actions they were responsible for completing, or how they would agree upon decisions.</p>

<sup>64</sup>Agencies may continue to use multiple processes to prioritize evidence needs moving forward. However, as they develop new or revise existing processes to develop evidence-building plans (or learning agendas), the Evidence Act requires agencies to consult with stakeholders, including the public, other agencies, state and local governments, and representatives of nongovernmental researchers. 5 U.S.C. § 312(c).

Agency	Extent to which actions reflect leading practice	Explanation
<b>Department of Health and Human Services (HHS)</b>	Reflects	HHS officials described roles and responsibilities related to evidence prioritization in its budget formulation process. For example, as part of their budget formulation materials, HHS’s divisions prepare plans to prioritize the development of new evidence—such as evaluations and data collection efforts. HHS leadership reviews division budget requests and discusses policy and program implications, and sets the department’s priorities for evidence-building activities.
<b>Department of Labor (DOL)</b>	Reflects	Officials in DOL’s Office of the Chief Evaluation Officer described roles and responsibilities it and others—such as department leaders, component agency leaders, and staff—play in the department’s learning agenda and evaluation plan processes.
<b>U.S. Agency for International Development (USAID)</b>	Reflects	USAID established roles and responsibilities for entities involved in the effort to prioritize evidence needs through its Program Cycle Operational Policy and other agency-wide guidance. For example, each USAID Mission is tasked with developing a plan to build a portfolio of evidence and designating an office or point of contact responsible for carrying out each task in that plan.  For learning agendas, USAID’s guidance encourages identifying responsibilities related to their development. For example, for its agency-wide Self-Reliance learning agenda, USAID bureaus and missions provided input to help narrow an initial list of 260 potential questions to the 13 that comprise the agenda.

Source: GAO analysis of agency information. | GAO-20-119.

Note: Reflects = Actions reflect all aspects of this leading practice.

Partially reflects = Actions reflect some but not all aspects of this leading practice.

CNCS officials said that the primary focus of the agency’s process is budget formulation. Therefore, roles and responsibilities are generally related to that purpose instead of the evidence prioritization activities that also take place during that process.

Clearly defining roles and responsibilities can ensure all participants are aware of and agree upon (1) who will have what responsibilities, (2) how they will organize their joint and individual evidence-building efforts, and (3) how they will make decisions.

**Written Guidance and Agreements**

As described in table 6, Education and USAID’s processes reflect this practice, while those at CNCS, DOL, and HHS reflect it in part.

**Table 6: Extent to Which Selected Agencies Developed Written Guidance and Agreements for Evidence Prioritization Processes**

**Leading Practice: Key aspects of collaborative activities, such as leadership, participants, and roles and responsibilities, are documented.**

Agency	Extent to which actions reflect leading practice	Explanation
<b>Corporation for National and Community Service (CNCS)</b>	Partially reflects	CNCS developed written guidance for its budget formulation process that identifies how the process incorporates evidence prioritization efforts. The guidance identifies that the process is led by CNCS’s Chief Executive Officer and other agency leaders, who are responsible for deciding on funding levels for strategies and initiatives, including proposed evidence-building activities. However, this guidance does not identify all participants expected to be included in the evidence prioritization aspects of the process, or their respective roles and responsibilities.
<b>Department of Education (Education)</b>	Reflects	<p>The charter for the Evidence Leadership Group (ELG) identifies leadership, participants, and roles and responsibilities for the group. In addition, it describes the purpose of the ELG, its background, and the decision-making process for the group.</p> <p>The charter for the now-defunct Evidence Planning Group clearly identified the group’s objective of coordinating evidence-building activities across the department. The charter also identified the primary activities on which the EPG was responsible for working with Education staff, such as recommending how to use Education’s pooled evaluation authority and identifying grant competitions in which the use of evidence may be appropriate. However, the charter did not provide specific participants, roles, and responsibilities for implementing these activities.</p>
<b>Department of Health and Human Services (HHS)</b>	Partially reflects	HHS developed written guidance for its overall budget formulation process. However, that guidance does not provide details related to the evidence prioritization aspects of that process—including related leadership, relevant participants, and roles and responsibilities.
<b>Department of Labor (DOL)</b>	Partially reflects	DOL’s Office of the Chief Evaluation Officer (CEO) provides written guidance to participants involved in the department’s learning agenda and evaluation plan processes. For example, CEO distributes materials at agency-wide meetings to kick off the annual learning agenda process. Those materials describe the goals of the process and how the CEO could support component agency efforts, among other things. However, the guidance materials do not fully identify participants and their related roles and responsibilities.
<b>U.S. Agency for International Development (USAID)</b>	Reflects	USAID has written guidance for its Program Cycle that clearly lays out leadership, participants, and roles and responsibilities for evidence prioritization activities. USAID also produced a series of documents outlining a process for developing learning agendas, including how to ensure they address leadership, participants, and roles and responsibilities. USAID followed this process in developing its agency-wide Self-Reliance learning agenda.

Source: GAO analysis of agency information. | GAO-20-119

Note: Reflects = Actions reflect all aspects of this leading practice.

Partially reflects = Actions reflect some but not all aspects of this leading practice.

Officials at CNCS, HHS, and DOL gave different reasons for why their written guidance and agreements related to evidence prioritization processes do not fully reflect this leading practice.

- CNCS’s and HHS’s written guidance primarily focuses on their budget formulation processes, since this is where their evidence prioritization activities take place. Thus, these guidance documents contain information on leadership, participants, and roles and responsibilities related to budget formulation activities, but not all relevant details related to evidence prioritization.
- Officials at DOL stated that they do not want to take a “one-size-fits-all” approach to developing learning agendas within the department. They told us they had not developed specific written guidance for that process to provide flexibility to component agencies to develop processes that work best for them in developing their learning agendas.

As we have previously found, documenting a clear and compelling rationale to work together—and how that work will be done and by whom—is a key factor in successful collaboration.<sup>65</sup> By incorporating this leading practice into their existing guidance, CNCS, HHS, and DOL would have greater assurance that they are effectively collaborating to prioritize evidence needs.

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## Conclusions

Decision makers need evidence to help them address pressing governance challenges faced by the federal government. Agencies undertake a range of efforts at different organizational levels to build evidence to meet their own decision-making needs, as well as those of others, such as Congress. However, these evidence-building activities are fragmented within agencies. Through a more comprehensive and coordinated framework, Evidence Act implementation provides opportunities to improve the effectiveness of federal evidence-building activities.

The five selected agencies have taken steps to improve the coordination of evidence-building activities across their organizations, with Education’s and USAID’s evidence-building activities reflecting the leading practices

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<sup>65</sup>[GAO-12-1022](#).

for collaboration. CNCS, DOL, and HHS would have greater assurance that they are comprehensively considering evidence needs across their individual organizations by fully incorporating leading collaboration practices into their agency-wide efforts to prioritize new evidence to generate. These actions could also help ensure these agencies are better managing fragmented evidence-building activities and more effectively focusing their limited resources to generate evidence to meet decision makers' needs. In addition, improved coordination could reduce the potential for any unwarranted overlap and duplication in their efforts, and better position the agencies to meet the Evidence Act's requirements and related implementation actions outlined in OMB's guidance.

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## Recommendations for Executive Action

We are making a total of seven recommendations, including three to CNCS, two to HHS, and two to DOL. Specifically:

The Chief Executive Officer of CNCS should develop an approach to ensure that all relevant participants are involved in the agency-wide process for prioritizing evidence needs. (Recommendation 1)

The Chief Executive Officer of CNCS should define roles and responsibilities for all relevant participants involved in the agency-wide process for prioritizing evidence needs. (Recommendation 2)

The Chief Executive Officer of CNCS should revise written guidance for the agency-wide process for prioritizing evidence needs to ensure it identifies all relevant participants and their respective roles and responsibilities. (Recommendation 3)

The Secretary of Health and Human Services should develop an approach to ensure that all relevant participants are involved in the department-wide process for prioritizing evidence needs. (Recommendation 4)

The Secretary of Health and Human Services should revise written guidance for the department-wide process for prioritizing evidence needs to ensure it identifies all relevant participants and their respective roles and responsibilities. (Recommendation 5)

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The Secretary of Labor should develop an approach to ensure that all relevant participants are involved in the department-wide process for prioritizing evidence needs. (Recommendation 6)

The Secretary of Labor should revise written guidance for the department-wide process for prioritizing evidence needs to ensure it identifies all relevant participants and their respective roles and responsibilities. (Recommendation 7)

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## Agency Comments and Our Evaluation

We provided a draft of this product for comment to OMB and the five selected agencies—CNCS, Education, HHS, DOL, and USAID. CNCS, Education, HHS, DOL and USAID provided written comments, which are summarized below and reproduced in appendixes V, VI, VII, VIII, and IX, respectively. In addition, CNCS, Education, HHS, USAID, and OMB provided technical comments, which we incorporated as appropriate.

In its written comments, CNCS neither agreed nor disagreed with the three recommendations we directed to it. The agency stated that it believes the planned actions included in its Strategic Evidence Plan, published in September 2019, address those recommendations. The plan includes a goal to strengthen how the agency prioritizes and uses evidence, and outlines various actions intended to achieve that goal. The plan does not include sufficient details to enable us to assess the extent to which its implementation would fully address the issues identified in our review and covered by our recommendations.

Education stated in its written comments that the department is committed to maximizing the performance of its programs, and it views building, using, and disseminating evidence as critical to those efforts. Education also outlined planned and proposed actions that it believes would further its evidence-building activities.

In its written comments, HHS did not concur with the two recommendations we directed to it. In response to both recommendations, HHS stated that the department had developed an approach for including all relevant participants in its process for prioritizing evidence needs. However, according to an HHS official in November 2019, HHS had not yet finalized the approach, and therefore was unable to provide any additional information about it. Thus we could

not assess the extent to which HHS's stated actions would address our recommendations.

DOL agreed with the two recommendations we directed to it, and in its written comments described an action it plans to take to address them. We will monitor DOL's action, which we believe would likely address our recommendations, if effectively implemented.

USAID, in its written comments, reiterated the agency's commitment to a comprehensive and integrated approach for its evidence-building activities. In the draft of this report we sent to USAID for its review in October 2019, we included a recommendation to USAID that it ensure that all relevant participants are involved in agency-wide processes for prioritizing evidence needs. USAID subsequently provided documentation that it had not provided previously that showed the agency had taken various steps to seek the input of a range of external stakeholders. We determined that these actions addressed our draft recommendation. Thus, we removed the draft recommendation from our report.

We are sending copies of this report to the appropriate congressional committees, the Director of the Office of Management and Budget, the Chief Executive Officer of the Corporation for National and Community Service, the Secretary of the Department of Education, the Secretary of the Department of Health and Human Services, the Secretary of the Department of Labor, the Administrator of the U.S. Agency for International Development, and other interested parties. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-6806 or [sagerm@gao.gov](mailto:sagerm@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix X.



Michelle Sager  
Director, Strategic Issues

# Appendix I: Objectives, Scope, and Methodology

This report responds to a request that we review the coordination of federal evidence-building activities. This report (1) describes activities selected agencies have taken that align with congressional and Office of Management and Budget (OMB) direction to strengthen evidence-building, and (2) examines the extent to which selected agencies' processes for assessing and prioritizing evidence needs reflect leading practices for collaboration.

To address both objectives, we analyzed agency documents about federal evidence-building activities and interviewed relevant staff at OMB and officials at five selected agencies: the Departments of Education, Health and Human Services, and Labor; the Corporation for National and Community Service; and the U.S. Agency for International Development.

We selected these five agencies based on their experiences incorporating evidence-building activities into program design and implementation. These experiences include evidence-based approaches such as pay for success projects, performance partnerships, and tiered evidence grants.<sup>1</sup> At the time we made our selection, these five agencies had designed or implemented evidence-based approaches to a greater extent than other agencies we identified.<sup>2</sup>

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<sup>1</sup>Appendix III identifies and provides details about the use of evidence-based approaches at these agencies.

<sup>2</sup>We identified agencies that had designed and implemented pay for success projects, performance partnerships, and tiered evidence grants since 2010 by reviewing our related past work, conducting literature searches, and reviewing agency websites and information. OMB staff who have government-wide purview of federal agencies' use of these approaches confirmed the examples we found and identified a few others. Based on this information, we identified 11 agencies that had collectively designed and implemented 30 examples of evidence-based approaches. We selected the five agencies with the highest number of these approaches.

The agencies we selected vary in size—as measured by budget authority and employees—and organizational structure (see table 7).

**Table 7: Size and Structure of Selected Agencies**

Agency	Budget authority (in billions) fiscal year 2018	Employees	Organizational structure
Corporation for National and Community Service	\$1.3	560	7 program offices
Department of Education	\$72.1	3,691	17 offices
Department of Health and Human Services	\$1,176.4	82,406	11 operating divisions 14 staff divisions
Department of Labor	\$43.2	14,297	30 offices and agencies
U.S. Agency for International Development (USAID)	\$24.4 <sup>a</sup>	9,475 <sup>b</sup>	15 bureaus 9 independent offices

Source: Data from Budget of the U.S. Government, Fiscal Year 2020; FedScope, and agency websites and officials. | GAO-20-119

Notes: Fiscal year 2018 represents the most recent data for actual budget authority. Employee data represent the number of employees in pay status as of December 2018, the most recent data available.

<sup>a</sup>According to USAID officials, this amount reflects accounts that USAID fully and partially managed for fiscal year 2018.

<sup>b</sup>This figure reflects total staff on board, as of September 30, 2018, across employment categories, including foreign and civil service personnel, personal service contractors, and foreign nationals hired abroad.

For the first objective, we reviewed information from the five selected agencies and identified examples of evidence-building activities within each agency since 2010. We then determined if these examples illustrated actions that aligned with evidence-building statutory requirements and directions from OMB including guidance, memorandums, and activities outlined in the President’s Management Agenda.<sup>3</sup> To do so, we reviewed relevant laws and OMB guidance.

For the second objective, we evaluated processes each selected agency had established to take a coordinated approach to assessing and prioritizing evidence needs across the agency.<sup>4</sup> We compared these

<sup>3</sup>OMB, *President’s Management Agenda* (Washington, D.C.: Mar. 20, 2018).

<sup>4</sup>Although we focus on agencies’ approaches for assessing and prioritizing evidence needs in this report, our past work has reviewed agencies’ efforts to generate and use evidence, as described earlier in this report.

processes to four selected leading practices for collaboration identified in our prior work (see table 8).<sup>5</sup>

**Table 8: Selected Leading Practices for Collaboration**

Practice	Description
Leadership	Agencies should identify a leadership model for their collaborative efforts. Designating leadership can centralize accountability and speed decision-making in collaborative efforts. Leadership models range from identifying one agency, office, or person to lead, to assigning shared leadership over a collaborative mechanism.
Participants	Relevant participants should be included when collaborating across organizational lines. Internal to the agency, this can cover a wide range of stakeholders, including agency leadership, program staff, and those with functional management responsibilities, such as in information technology, budget, and human capital. Key external stakeholders for federal agencies can include Congress, other federal agencies, state and local governments, grant recipients, and regulated entities, among others. Including relevant participants can help ensure collaborative efforts have the right staff with full knowledge of resources available to resolve policy and program challenges.
Roles and Responsibilities	Participants involved in collaborative activities should work together to define and agree on their respective roles and responsibilities. Doing so provides clarity about who will do what, how to organize their joint and individual efforts, and how to facilitate decision-making.
Written Guidance and Agreements	Agencies should develop and maintain written documentation of their agreed-upon processes. When appropriate, this guidance should identify and describe, among other things, those involved in leading and participating in the collaborative activities, along with their respective roles and responsibilities. Written guidance can strengthen participants' commitment to working collaboratively. Also, written guidance can help define a clear and compelling rationale for participants to work together, which may help them overcome significant differences.

Source: GAO-12-1022. | GAO-20-119.

We selected these four collaboration practices because our past work on evidence-building activities, such as analysis of performance information and program evaluations, has similarly identified them as key approaches related to evidence-building. Table 9 illustrates this alignment for selected past reports.

<sup>5</sup>GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, GAO-12-1022 (Washington, D.C.: Sept. 27, 2012).

**Table 9: Alignment of Leading Practices for Collaboration with Evidence-Building Approaches Identified in Prior GAO Reports**

Leading Practices for Collaboration <sup>a</sup>	Practices for Evidence-Building			
	Analysis of Performance Information		Program Evaluation	
	<a href="#">GAO-13-228</a> <sup>b</sup>	<a href="#">GAO-15-602</a> <sup>c</sup>	<a href="#">GAO-15-25</a> <sup>d</sup>	<a href="#">GAO-17-743</a> <sup>e</sup>
Leadership	Yes	Yes	Yes	Yes
Participants	Yes	Yes	Yes	Yes
Roles and responsibilities	Yes	Yes	Yes	—
Written guidance	Yes	Yes	Yes	Yes

Source: GAO. | GAO-20-119

<sup>a</sup>GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sep. 27, 2012).

<sup>b</sup>GAO, *Managing for Results: Data-Driven Performance Reviews Show Promise But Agencies Should Explore How to Involve Other Relevant Agencies*, [GAO-13-228](#) (Washington, D.C.: Feb. 27, 2013).

<sup>c</sup>GAO, *Managing for Results: Practices for Effective Agency Strategic Reviews*, [GAO-15-602](#) (Washington, D.C.: July 29, 2015).

<sup>d</sup>GAO, *Program Evaluation: Some Agencies Reported that Networking, Hiring, and Involving Program Staff Help Build Capacity*, [GAO-15-25](#) (Washington, D.C.: Nov. 13, 2014).

<sup>e</sup>GAO, *Program Evaluation: Annual Agency-Wide Plans Could Enhance Leadership Support for Program Evaluations*, [GAO-17-743](#) (Washington, D.C.: Sep. 29, 2017).

We conducted this performance audit from April 2018 to December 2019 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

# Appendix II: Selected Actions Taken by Congress and OMB to Strengthen Federal Evidence-Building Activities and Improve Coordination

The Office of Management and Budget (OMB) has issued several memorandums and other key policy documents that encourage agencies to take actions to strengthen their capacity to build evidence. For example, in a July 2013 memorandum, OMB encouraged agencies to identify proposals for building evidence in their budget requests. Such proposals could be used to improve existing programs or inform decisions about new programs.<sup>1</sup> The OMB guidance highlighted several evidence-based approaches for agencies to consider, including pay for success, performance partnerships, and tiered evidence grants, described further in the text box below.<sup>2</sup>

## Examples of Evidence-Based Program Approaches Identified in Office of Management and Budget (OMB) Guidance

**Pay for success.** Pay for success is a contracting mechanism under which final payment is contingent upon achieving specific outcomes. The government specifies performance outcomes in pay for success contracts and generally includes a requirement that contractors assess program outcomes or impacts through an independent evaluation. The evaluators may also generate and analyze performance data to inform program management and improvement during implementation.

<sup>1</sup>OMB, *Next Steps in the Evidence and Innovation Agenda*, M-13-17 (Washington, D.C.: July 26, 2013).

<sup>2</sup>In several prior reports, we examined federal agencies' use of these evidence-based approaches. See GAO, *Performance Partnerships: Agencies Need to Better Identify Resource Contributions to Sustain Disconnected Youth Pilot Programs and Data to Assess Pilot Results*, [GAO-17-208](#) (Washington, D.C.: Apr. 18, 2017); *Tiered Evidence Grants: Opportunities Exist to Share Lessons from Early Implementation and Inform Future Federal Efforts*, [GAO-16-818](#) (Washington, D.C.: Sept. 21, 2016); and *Pay for Success: Collaboration among Federal Agencies Would Be Helpful as Governments Explore New Financing Mechanisms*, [GAO-15-646](#) (Washington, D.C.: Sept. 9, 2015). These reports also identified potential benefits and challenges related to the design and implementation of these approaches.

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**Appendix II: Selected Actions Taken by Congress and OMB to Strengthen Federal Evidence-Building Activities and Improve Coordination**

**Performance partnerships.** Performance partnerships allow federal agencies to provide grant recipients flexibility in how they use funding across two or more programs along with additional flexibilities. In exchange, the recipient commits to improve and assess progress toward agreed-upon outcomes by developing and using evidence.

**Tiered evidence grants.** Tiered evidence grants seek to incorporate evidence of effectiveness into grant making. Federal agencies establish tiers of grant funding based on the level of evidence grantees provide on their approaches to deliver social, educational, health, or other services. The grant generally requires grantees to evaluate their service models as a condition for the receipt of grant funds.

Source: GAO and OMB. | GAO-20-119.

In addition, Congress passed laws aimed at strengthening and better coordinating evidence-building activities, which OMB reinforced through related guidance to implement those laws.

**GPRMA Modernization Act (GPRAMA).** GPRAMA established a framework aimed at taking a more crosscutting and integrated approach to improve government performance. Requirements included in that framework, such as cross-agency priority (CAP) goals and strategic reviews, were intended to strengthen evidence-building activities and improve coordination.

- **CAP goals.** At least every 4 years, OMB is to coordinate with other agencies to develop and implement CAP goals.<sup>3</sup> These goals are to address issues in a limited number of policy areas requiring action across multiple agencies, or management improvements that are needed across the government.<sup>4</sup> The President's Management Agenda, released in March 2018, established the third set of CAP goals since GPRAMA was enacted.<sup>5</sup> Implementation of each CAP

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<sup>3</sup>31 U.S.C. § 1120(a). OMB is also required to coordinate with agencies to develop annual federal government performance plans to define, among other things, the level of performance to be achieved toward the CAP goals. 31 U.S.C. § 1115(a).

<sup>4</sup>Our work reviewing the prior two sets of CAP goals found that their implementation can have positive results, such as improving collaboration. See, for example, GAO, *Managing for Results: Further Progress Made in Implementing the GPRMA Modernization Act, but Additional Actions Needed to Address Pressing Governance Challenges*, [GAO-17-775](#) (Washington, D.C.: Sept. 29, 2017); GAO, *Managing for Results: OMB Improved Implementation of Cross-Agency Priority Goals, But Could Be More Transparent About Measuring Progress*, [GAO-16-509](#) (Washington, D.C.: May 20, 2016); and *Managing for Results: Implementation of GPRMA Modernization Act Has Yielded Mixed Progress in Addressing Pressing Governance Challenges*, [GAO-15-819](#) (Washington, D.C.: Sept. 30, 2015).

<sup>5</sup>OMB, *President's Management Agenda* (Washington, D.C.: Mar. 20, 2018).

goal can involve evidence-building activities; however, two goals in particular are to focus on them, as described further in the text box.<sup>6</sup>

A **strategic objective** is a type of goal that reflects the outcome or impact the agency is seeking to achieve. The agency is to identify the strategies—the portfolio of organizations, regulations, tax expenditures, programs, policies, and other activities—within and external to the agency that contribute to each strategic objective. As a set, the agency's strategic objectives are to encompass all of its activities.

Source: Office of Management and Budget Circular No. A-11. | GAO-20-119

#### Cross-Agency Priority (CAP) Goals Focused on Evidence-Building

**Leveraging data as a strategic asset.** The President's Management Agenda highlights several root causes for the challenges the federal government faces. One root cause is that agencies do not consistently apply data-driven decision-making practices. This agenda states that agencies need to make smarter use of data and evidence to orient decisions and accountability around service and results. The administration established this CAP goal to improve the use of data in decision-making to increase the federal government's effectiveness.

**Results-oriented accountability for grants.** According to the June 2019 update for this goal, the federal government uses grants to invest approximately \$700 billion each year in mission-critical needs. However, the report states that grant managers report spending 40 percent of their time using antiquated processes to monitor compliance instead of analyzing data to improve results. The administration established this CAP goal to maximize the value of grant funding by applying a risk-based, data-driven framework that balances compliance requirements with demonstrating successful results.

<sup>6</sup>In September 2018, we examined efforts related to the Leveraging Data as a Strategic Asset CAP goal. For additional information, see GAO, *Managing for Results: Government-Wide Actions Needed to Improve Agencies' Use of Performance Information in Decision Making*, [GAO-18-609SP](#) (Washington, D.C.: Sept. 5, 2018).

<sup>7</sup>OMB, Circular No. A-11, *Preparation, Submission, and Execution of the Budget*, pt 6, at § 260.9 (2019). For our past work related to strategic reviews, see GAO, *Managing for Results: Selected Agencies' Experiences in Implementing Strategic Reviews*, [GAO-17-740R](#) (Washington, D.C.: Sept. 7, 2017) and *Managing for Results: Practices for Effective Agency Strategic Reviews*, [GAO-15-602](#) (Washington, D.C.: July 29, 2015).

<sup>8</sup>OMB Cir. No. A-11, at §§ 260.9 and 260.11 (2019). OMB's guidance states that agencies should, at a minimum, consider performance information, evaluations, research studies, data and policy analysis, or other assessments relevant to the objective or its strategies. In addition, in July 2015, we found that studies conducted by external entities, such as academics, think tanks, nonprofits, associations, and oversight entities (such as ourselves or Inspectors General), may prove useful to the review. See [GAO-15-602](#).

<sup>9</sup>OMB Cir. No. A-11, at § 260.9 (2019).

**The Foreign Aid Transparency and Accountability Act of 2016 (FATAA).** Among other things, FATAA requires the President to establish guidelines for establishing measurable goals, performance metrics, and monitoring and evaluation plans for federal foreign assistance.<sup>10</sup> In January 2018, OMB issued guidelines for federal agencies that administer foreign assistance—which includes the Departments of Labor and Health and Human Services, and the U.S. Agency for International Development.<sup>11</sup> Among other things, the guidelines provide direction on strengthening evidence-building activities, such as establishing annual monitoring and evaluation plans, and disseminating findings and lessons learned. Agencies were directed to align their monitoring and evaluation policies with the guidelines by January 2019.<sup>12</sup>

**The Foundations for Evidence-Based Policymaking Act of 2018 (Evidence Act).** In June and July 2019, OMB released its initial guidance on implementing the Evidence Act.<sup>13</sup> Among other things, this guidance provides direction to agencies on developing evidence-building plans, also known as learning agendas (see text box below).<sup>14</sup> According to

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<sup>10</sup>Pub. L. No. 114-191, § 3(b) 130 Stat. 666, 667 (July 15, 2016)

<sup>11</sup>OMB, *Monitoring and Evaluation Guidelines for Federal Departments and Agencies that Administer United States Foreign Assistance*, OMB Memorandum M-18-04 (Washington, D.C.: Jan. 11, 2018).

<sup>12</sup>In July 2019, we assessed OMB's guidelines and the extent to which six selected agencies' monitoring and evaluation policies and plans incorporated those guidelines. This report focused on the six agencies that reported obligating the most foreign assistance: the Departments of Agriculture, Defense, Health and Human Services, and State; the Millennium Challenge Corporation; and the U.S. Agency for International Development. For additional information, see GAO, *Foreign Assistance: Federal Monitoring and Evaluation Guidelines Incorporate Most but not all Leading Practices*, [GAO-19-466](#), (Washington, D.C.: July 31, 2019).

<sup>13</sup>OMB Cir. No. A-11, at § 290 (2019) and *Phase I Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Learning Agendas, Personnel, and Planning Guidance*, OMB Memorandum M-19-23 (Washington, D.C.: July 10, 2019). In this guidance, OMB noted that it expects to provide additional guidance in three subsequent phases, covering open data access and management, data access for statistical purposes, and program evaluation.

<sup>14</sup>OMB M-19-23. This long-term plan is to take a systematic approach to identifying and addressing policy questions relevant to an agency's programs, policies, and regulations. Developed in consultation with stakeholders, the plan is also to describe the data, methods, and analytical approaches that will be used to develop evidence. This requirement applies to 24 major federal agencies, including Education, HHS, Labor, and USAID.

OMB, these plans will serve as the driving force for other evidence-building activities required by the Evidence Act.

**Learning Agendas**

Prior to the enactment of the Foundations for Evidence-Based Policymaking Act (Evidence Act), both the Office of Management and Budget (OMB) and the Commission on Evidence-Based Policymaking highlighted and recommended the use of learning agendas by federal agencies to strengthen and coordinate their evidence-building activities.

According to OMB's guidance for implementing the Evidence Act, a learning agenda is to define and prioritize relevant questions and identify strategies for building evidence to answer them. A federal agency developing a learning agenda should involve key leaders and stakeholders to help (1) meet their evidence needs for decision-making, and (2) coordinate evidence-building activities across an agency.

learning agenda.

OMB's guidance stated that the Evidence Act emphasizes the need for collaboration and coordination of agency staff and activities to achieve successful implementation. The guidance provides time frames for a phased approach to implement several Evidence Act requirements. For example, although learning agendas are not required to be published until February 2022, OMB's guidance includes several interim milestones and deliverables to build toward the final published version.

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<sup>15</sup>U.S.C. §§ 306, 312.

<sup>16</sup>OMB embedded portions of Evidence Act implementation guidance in its 2019 update to Cir. No. A-11. In it, OMB noted that many of the Evidence Act's provisions support the Federal Performance Framework for Improving Program and Service Delivery (Part 6 of the Circular), which provides guidance for implementing GPRAMA and other related laws and policies. OMB Cir. No. A-11, at § 200.2 (2019).

# Appendix III: Examples of Evidence-Building Approaches at Five Selected Agencies

## Evidence-Building Approaches Used by Selected Agencies

We identified 20 examples of the five selected agencies' incorporating evidence-based approaches in their program design and implementation.<sup>1</sup> Table 10 describes each of these examples.

**Table 10: Examples of Evidence-Based Approaches Used by Five Selected Agencies**

Agency	Program	Description
Corporation for National and Community Service (CNCS)	<b>Social Innovation Fund</b> (Tiered Evidence Grant <sup>a</sup> and Pay for Success <sup>b</sup> )	Provided funding and combined public and private resources to support growing the impact of innovative community-based solutions that had compelling evidence of improving the lives of people in low-income communities throughout the United States in three priority areas: youth development, economic opportunity, and healthy futures. Congress eliminated funding for the program in fiscal year 2017. Agency officials told us they shifted management of the remaining grants to its Office of Research and Evaluation in 2019.
Department of Labor (DOL)	<b>Workforce Innovation Fund</b> (Tiered Evidence Grant)	Funded system reform and innovative approaches to the design and delivery of employment and training services that generate long-term improvements in the performance of the public workforce system, outcomes for job seekers and employers, and cost-effectiveness.  According to agency officials, grants awarded under the fund had a rigorous evaluation component, which increased accountability, expanded the body of evidence in workforce development, and helped the workforce system grow what works.

<sup>1</sup>Although the table identifies 16 examples of evidence-based approaches, CNCS's Social Innovation Fund involved both pay for success projects and tiered evidence grants. Therefore, we counted it as two examples. In addition, the Performance Partnership Pilots for Disconnected Youth involve multiple agencies. We counted it as an example for each of the four selected agencies involved: CNCS, DOL, Education, and HHS.

**Appendix III: Examples of Evidence-Building Approaches at Five Selected Agencies**

<b>Agency</b>	<b>Program</b>	<b>Description</b>
	<b>Reemployment Services and Eligibility Assessments</b> (Tiered Evidence Grant)	With the goal of reducing the average time individuals receive unemployment compensation by improving their employment outcomes, the program aims to link unemployment insurance claimants to the public workforce system, addresses their individual reemployment needs, and helps states prevent and detect improper payments by conducting unemployment insurance eligibility reviews. Although DOL does not expect to implement a tiered evidence structure until fiscal year 2023, the department is encouraging grantees to incorporate evidence-building activities into their program design and implementation.
	<b>Workforce Innovation Fund Pay for Success (PFS) Pilots</b>	Two pilots, in New York and Massachusetts, looked at PFS feasibility in workforce development to test a model for government investment in preventative and innovative service delivery models, and determine the impact of preventative social services as a complement to workforce development programs.
Department of Education (Education)	<b>Investing in Innovation /Education Innovation and Research</b> (Tiered Evidence Grant)	Provides competitive grants to applicants with a record of improving student achievement and attainment to expand innovative practices that are demonstrated to help improve student achievement or student growth, close achievement gaps, decrease dropout rates, increase high school graduation rates, or increase college enrollment and completion rates.
	<b>First in the World</b> (Tiered Evidence Grant)	Supported the development, replication, and dissemination of innovative solutions and evidence for what works in addressing persistent and widespread challenges in postsecondary education for students who are at risk for not persisting in and completing postsecondary programs. This included, but was not limited to, adult learners, working students, part-time students, students from low-income backgrounds, students of color, students with disabilities, and first-generation students.
	<b>Preschool Pay for Success Initiative</b>	A limited 30-month pilot that funded the development of feasibility studies to test the viability and appropriateness of using PFS models as a way to pay for preschool services.
	<b>Individuals with Disabilities Education Act (IDEA) Part C Early Intervention/Part B Preschool Pay for Success Initiative</b>	Funded technical assistance focused on building capacity for and sharing information about potential PFS programs in IDEA.
	<b>Office of English Language Acquisition Pay for Success Initiative</b>	Studied the feasibility of using a PFS funding mechanism to engage local communities and implement early learning/dual-language models for students, specifically Spanish-speaking students from kindergarten through third grade.
	<b>Office of Career, Technical, and Adult Education Pay for Success Initiative</b>	Studied the feasibility of using, and subsequently developed approaches for conducting, PFS projects for career, technical, and adult education for underserved, high-need youth, and to move into providing transaction structuring.
Department of Health and Human Services (HHS)	<b>Teen Pregnancy Prevention</b> (Tiered Evidence Grant)	Invests in the implementation of evidence-based teen pregnancy prevention programs, and provides funding to develop and evaluate new and innovative approaches to prevent teen pregnancy.

**Appendix III: Examples of Evidence-Building Approaches at Five Selected Agencies**

<b>Agency</b>	<b>Program</b>	<b>Description</b>
	<b>Maternal, Infant, and Early Childhood Home Visiting Program</b> (Tiered Evidence Grant)	Provides states, territories, and tribal entities funds to administer local home visiting programs which provide at-risk pregnant women and families with services from health, social service, and child development professionals to support the health and development of children. Based on the extent of available evidence, the program provides funds to grantees through two tiers, with the majority of program funds being spent on models with sufficient evidence of effectiveness.
U.S. Agency for International Development (USAID)	<b>Development Innovation Ventures</b> (Tiered Evidence Grant)	Provides flexible funding to grantees to identify, test, and scale new solutions to development challenges to test new ideas, take strategic risks, build evidence of what works, and advance the best solutions in any sector and any country in which USAID operates.
	<b>Development Innovation Ventures Impact Bond Pilot</b> (PFS)	USAID officials told us they awarded a Development Innovation Ventures grant to Instiglio, an organization that provides technical assistance in creating and implementing impact bonds and other results-based financing projects. It used the funding to explore opportunities for a development impact bond in Latin America focused on developing a small impact bond pilot in workforce development and building the capacity of local actors.
	<b>Utkrisht Impact Bond</b> (PFS)	This development impact bond, a type of PFS project, seeks to reduce the number of maternal and newborn deaths by improving the quality of care for mothers and newborns in the state of Rajasthan, India.
Multiple Agencies (including CNCS, DOL, Education, and HHS)	<b>Performance Partnership Pilots for Disconnected Youth</b>	Enables grant recipients to obtain flexibility to use funds awarded across multiple federal programs to be combined into pilot programs serving disconnected youth. These pilots seek to identify cost-effective strategies for providing services that can address challenges and improve outcomes for youth who are low income and either homeless, in foster care, involved in the juvenile justice system, unemployed, or not enrolled in or at risk of dropping out of an educational institution.

Source: GAO analysis of agency information. | GAO-20-119.

<sup>a</sup>Tiered evidence grants seek to incorporate evidence of effectiveness into grant making. Federal agencies establish tiers of grant funding based on the level of evidence grantees provide on their approaches to deliver social, educational, health, or other services. The grant generally requires grantees to evaluate their service models as a condition for the receipt of grant funds.

<sup>b</sup>Pay for success is a contracting mechanism under which final payment is contingent upon achieving specific outcomes. The government specifies performance outcomes in pay for success contracts and generally includes a requirement that contractors assess program outcomes or impacts through an independent evaluation. The evaluators also may generate and analyze performance data to inform program management and improvement during implementation.

## **Selected Agencies' Use of Evidence-Based Approaches Aligned with OMB Direction**

OMB's July 2013 memorandum stated that agencies' use of evidence-based approaches could help strengthen agencies' abilities to improve program performance by using experimentation and innovation to test new approaches for service delivery. In addition, it noted that these

approaches can be used to (1) generate new knowledge, and (2) apply existing evidence about approaches found to be effective.<sup>2</sup>

**Generate new knowledge.** OMB guidance notes that new knowledge can be used to improve existing programs or inform decisions about new ones. For example, Education designed the First in the World program to generate evidence about effective strategies for improving college completion rates for underrepresented, underprepared, or low-income students. Program officials told us that, prior to the issuance of the 2014 grant solicitation for the program's first year, Education had limited evidence of effective approaches. As noted in the solicitation, Education sought to expand its evidence base about effective approaches through the first round of grant awards.

Using a tiered evidence approach, the program awarded grants to institutions of higher education to implement and evaluate the effectiveness of approaches, such as coaching or advisement services, intended to increase the number of these students who complete postsecondary education. The first round awarded grant funds to projects in a single evidence tier to test and evaluate the effectiveness of approaches. Education officials told us that after the program's first year, they conducted a literature review to identify approaches that were supported by some evidence of their effectiveness. Using this evidence, Education created a second tier for the 2015 grant awards, for which grantees could receive increased funding by implementing one of the program designs identified in the literature review.

Officials told us they intend to publish the final results of First in the World grant recipient evaluations in Education's What Works Clearinghouse. Evaluation results will not be available until after the completion of the grant periods, the first of which ended in September 2019. However, Education officials told us that the evidence they have generated to date

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<sup>2</sup>OMB, *Next Steps in the Evidence and Innovation Agenda*, OMB Memorandum M-13-17 (Washington, D.C.: July 26, 2013).

has improved their understanding of services that could potentially help at-risk students complete post-secondary education.<sup>3</sup>

**Apply effective approaches.** To meet increased demand for services in a constrained resource environment, OMB's guidance encourages agencies to allocate resources to programs and approaches backed by strong evidence of effectiveness. In addition, OMB's guidance encourages agencies to "scale up" effective program approaches by expanding them to a larger or different group of recipients. For example, USAID created the Development Innovation Ventures program in 2010 as a tiered evidence grant competition to create a portfolio of innovative approaches to reducing global poverty.<sup>4</sup> This program provides funding in three tiers, with greater funding provided to those approaches with greater evidence of effectiveness. These three tiers (which USAID referred to as stages) were as follows:

1. **Proof of concept.** The program provided smaller grants to test the viability of an innovative approach;
2. **Testing and positioning for scale.** Grantees determined, through rigorous assessments, whether their approach could achieve greater results and also be implemented successfully at a larger scale; and
3. **Scaling.** The program funded the expanded implementation of an effective approach within one country or replicated that approach in another country.

For example, from 2013 to 2015, the Development Innovation Ventures program awarded stage two funding to a nonprofit organization in India. The organization designed a methodology to help primary school students improve reading skills by grouping students according to skill level, instead of age or grade and tailoring lessons to their learning level. Evidence generated through randomized control trials showed that the

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<sup>3</sup>Our September 2016 report on tiered evidence grants identified additional instances in which agencies sought to generate new knowledge through evidence-building activities. GAO, *Tiered Evidence Grants: Opportunities Exist to Share Lessons from Early Implementation and Inform Future Federal Efforts*, [GAO-16-818](#) (Washington, D.C.: Sept. 21, 2016). See, for example, information about CNC's Social Innovation Fund, which built evidence on community-based solutions for improving the lives of people in low-income communities.

<sup>4</sup>In December 2015, we examined USAID's implementation of this program. For further information, see GAO, *Foreign Assistance: USAID Venture Capital Approach Relies on Evidence of Results but Could Strengthen Collaboration among Similar Programs*, [GAO-16-142](#) (Washington, D.C.: Dec. 21, 2015).

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approach was effective. Based on that evidence, in 2017, the program awarded stage three funding to replicate the approach in Zambia.<sup>5</sup>

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<sup>5</sup>Our prior reports on performance partnerships and tiered evidence grants also highlighted ways in which agencies could identify effective approaches and potentially implement them more broadly. See GAO, *Performance Partnerships: Agencies Need to Better Identify Resource Contributions to Sustain Disconnected Youth Pilot Programs and Data to Assess Pilot Results*, [GAO-17-208](#) (Washington, D.C.: Apr. 18, 2017) and [GAO-16-818](#), respectively. In our April 2017 report on performance partnerships, we found that agencies needed to take additional steps to determine if and how to scale the approaches being tested by the pilots for disconnected youth. We recommended that OMB should coordinate with relevant agencies to identify criteria or standards for assessing scalability, and collect data needed to address those criteria or standards. As of May 2019, OMB and relevant agencies had reported taking some steps to address this recommendation, in part through a national evaluation of the pilots. However, as of October 2019, they had not shared with us the results of their work to confirm these actions. We will continue to monitor these efforts.

# Appendix IV: Additional Examples of Selected Agencies' Coordination of Evidence-Building Activities

Earlier in this report, we discussed agency-wide evidence assessment and prioritization processes established by the five selected agencies. In addition to those processes, officials described other actions they have taken to coordinate fragmented evidence-building activities across organizational levels (see table 11). Some of these actions were ad hoc (i.e., they did not occur regularly) or not comprehensive in nature (i.e., they did not focus broadly across different sources of evidence or did not cover the entire agency).

**Table 11: Examples of Actions Five Selected Agencies Reported Taking to Coordinate Evidence-Building Activities**

Agency	Evidence-building process	Description
Department of Education (Education)	Budget process	Education officials told us that the agency uses the annual budget process to assess evidence. Two times a year—when submitting budget requests to the Office of Management and Budget and when preparing the Congressional Budget Justification—Education’s Budget Service asks the Office of Planning, Evaluation, and Policy Development and the Institute of Education Sciences for evidence to strengthen budget requests. Budget Service reviews and includes performance information, evaluations, and other evidence for inclusion in this material. Education officials said that this information can be used to modify or propose ending programs that are not achieving intended results.
	National Center for Education Research	Education’s National Center for Education Research (NCER) supports education research to improve the quality of education and thereby increase student academic achievement, reduce the achievement gap between high- and low-performing students, and increase access to and completion of postsecondary education. NCER also supports research networks which create a structure and process for teams of researchers to coordinate on high priority issues. Education officials told us that NCER has a rigorous, routine process for identifying where Education needs to build additional evidence to support its work. In addition, a portion of NCER’s work is initiated by researchers in the field who have identified evidence gaps and are initiating work to address them.

**Appendix IV: Additional Examples of Selected Agencies' Coordination of Evidence-Building Activities**

<b>Agency</b>	<b>Evidence-building process</b>	<b>Description</b>
<b>Department of Health and Human Services (HHS)</b>	Evaluation and Evidence Policy Council (EEPC)	HHS created the EEPC in 2016 after Congress established the Commission on Evidence-Based Policymaking. The EEPC is led by the Office of the Assistant Secretary for Planning and Evaluation (ASPE) and includes directors and senior research officers across HHS agencies. The EEPC has been operating under a draft charter and has mostly served as a community of practice for evaluation officials across the agency. The EEPC convenes meetings of the agency's evaluation community to help build capacity by sharing best practices and promising new approaches across HHS.
	Data Council	Established in the mid-1990s, HHS's Data Council is the principal, senior internal departmental forum and advisory body to the Secretary on Health and Human Services data policy. The Council coordinates health and human services data collection and analysis activities in HHS, including an integrated data collection strategy as well as coordination of health data standards and privacy policy. The HHS Data Council consists of senior level officials designated by their agency and staff office heads, the Director of the National Center for Health Statistics, and the HHS Privacy Advocate/Expert. It is co-chaired by the Assistant Secretary for Planning and Evaluation on a permanent basis and the head of an operating division on a rotating basis.
	Senior Advisor for Evaluation and Evidence	HHS created the Office of the Assistant Secretary for Planning and Evaluation's Senior Advisor for Evaluation & Evidence position in 2015 in response to the Administration's actions asking HHS to make further use of data and evidence in policymaking (e.g., OMB Memorandum 13-17). The Senior Advisor coordinates with component agencies to discuss evidence and capacity needs to prepare HHS's evidence template submission.
	National Institutes of Health (NIH) collaborations	NIH has documented examples of how it has, in coordination with stakeholders including university researchers and private companies, prioritized and generated evidence to advance biomedical knowledge across and outside of HHS. Case studies of NIH contributions to research are documented in publicly available case studies on its website.
<b>Department of Labor (DOL)</b>	Clearinghouse for Labor Evaluation and Research (CLEAR) Database	CLEAR's mission is to make research on labor topics accessible to practitioners, policymakers, researchers, and the public. CLEAR identifies and summarizes research including descriptive, implementation, and impact studies. In addition, CLEAR assesses the quality of research that looks at the effectiveness of particular policies and programs.
	Performance Management Center (PMC)	DOL's PMC is the agency's central performance office. PMC looks at a variety of sources to identify and prioritize evidence-building activities, including component learning agendas, enterprise risk management, and performance data, which is reviewed by the performance improvement officer and chief operating officer. The PMC leads the development and cataloguing of evidence during the strategic review process.
	Chief Evaluation Officer (CEO)	DOL's CEO, a position established in 2010, develops and maintains a learning and evidence culture within DOL. Its primary responsibility is to manage DOL's evaluation program. CEO identifies and funds research and evaluation priorities established through a collaborative learning agenda process with DOL's component agencies.

**Appendix IV: Additional Examples of Selected Agencies' Coordination of Evidence-Building Activities**

Agency	Evidence-building process	Description
	Evaluation Policy Statement	The Evaluation Policy Statement presents key principles that govern DOL's planning, conduct, and use of program evaluations. According to DOL, the policy establishes the agency's commitment to conducting rigorous, relevant evaluations and to using evidence from evaluations to inform policy and practice. In addition, it promotes rigor, relevance, transparency, independence, and ethics in the conduct of DOL's evaluations. The Evaluation Policy Statement also states that evaluation priorities should take into account stakeholder interests, including those of the needs of leadership, specific agencies, program office staff, and DOL partners such as states, territories, tribes, and grantees, among others.
<b>Corporation for National and Community Service (CNCS)</b>	Data Analytics Working Group/Data Council	According to CNCS officials, in May 2018, the agency established a Data Analytics Working Group to help the agency think more strategically about its use of data, in line with the President's Management Agenda's focus on leveraging data as a strategic asset. The group studied how the agency used and could better use data across the scope of its programs and operations. In November 2018, the group recommended that the agency establish a pilot Data Council to help coordinate existing and emerging cross-agency data issues. It also recommended priorities for the council to focus on in fiscal year 2019, such as establishing guidelines for data governance across the agency. CNCS leadership established the council in November 2018.
	Evidence Briefs/Learning Memos	CNCS's Office of Research and Evaluation (ORE) developed and publicly disseminated a series of documents describing the evidence of effectiveness of the agency's programs, known as "evidence briefs" and "learning memos." According to CNCS officials, these documents are intended to help CNCS staff and external stakeholders, such as grantees, understand what works in the policy areas supported by CNCS's programs. For example, in November 2018 and February 2019, ORE published evidence briefs identifying projects or interventions determined to be effective in the areas of education and economic opportunity, respectively.
	State of the Evidence Report	CNCS published <i>2017 State of the Evidence</i> in August 2017 to demonstrate how and to what extent national service benefits communities. The report synthesized evidence collected during 2015 and 2016 on the agency's programs, including performance information, evaluation results, and statistical analyses. CNCS reported that research shows its AmeriCorps volunteers positively impact civic engagement in the communities in which they serve. In addition, CNCS reported that ORE found that volunteers have a statistically significant greater chance of finding a job after being out of work than non-volunteers.
	Research Summits	CNCS has held three "Research Summits" since late 2015 to expand the reach and usefulness of its information and data among CNCS staff, grantees, third-party researchers, and policymakers and practitioners, according to CNCS officials. The summits, the most recent of which occurred in September 2019, focused on highlighting studies and stories of how organizations, institutions, and government, in partnership with researchers, have been able to take findings from relevant research and use them to improve organizational policy and practices, and services to communities in need.
	"So What" Sessions	According to CNCS officials, ORE hosted a series of "so what sessions"—events that feature speakers from within and outside of CNCS presenting findings from their work and research—for staff across the agency. Sessions highlighted work and research to ensure that CNCS staff understand how programs can be improved. For example, one session focused on how AmeriCorps' work to improve student performance in persistently underachieving schools used research to further its efforts.

**Appendix IV: Additional Examples of Selected Agencies' Coordination of Evidence-Building Activities**

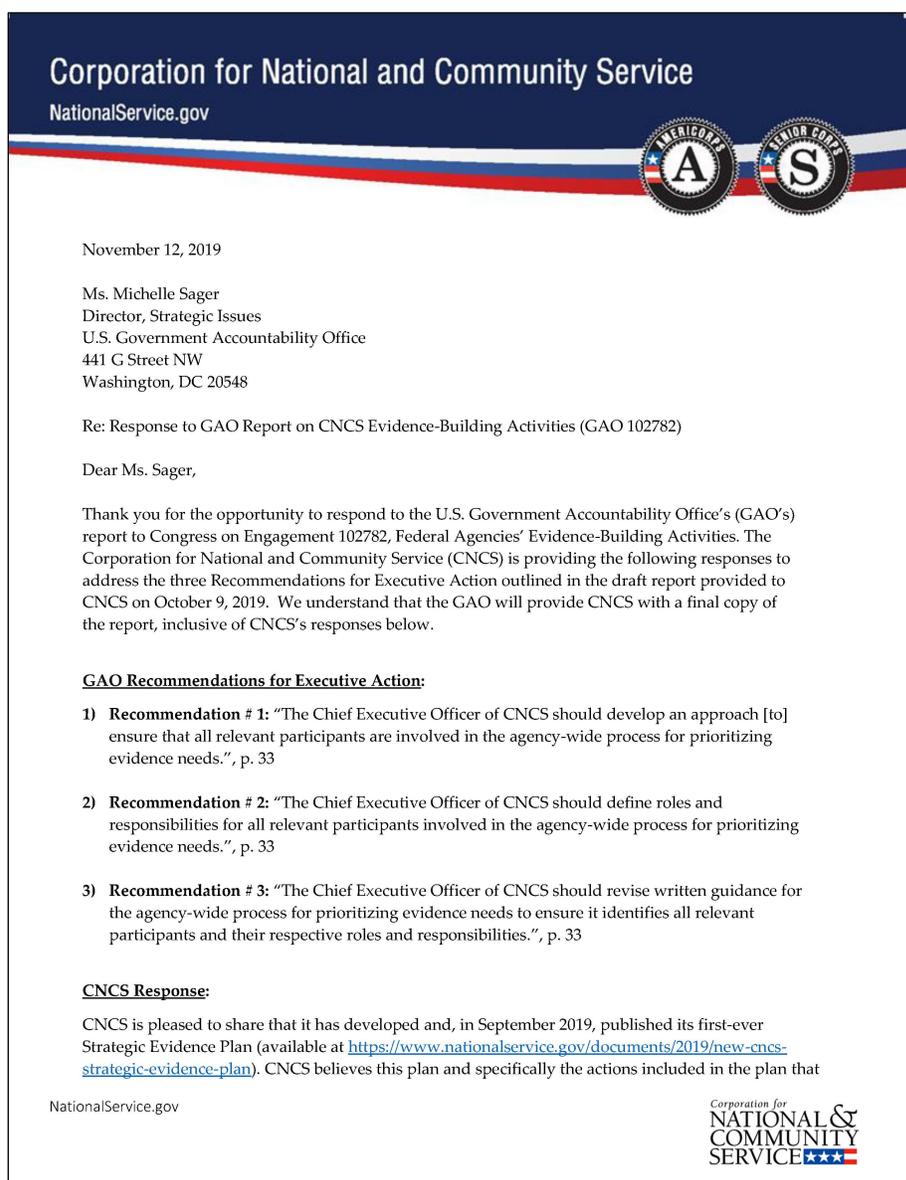
<b>Agency</b>	<b>Evidence-building process</b>	<b>Description</b>
	Evidence Exchange	The Evidence Exchange is a digital repository of research, evaluation reports, and data. It contains studies of CNCS programs including AmeriCorps and SeniorCorps, programs run by CNCS grantees, and issues related to mission and focus areas of CNCS, such as education, environmental stewardship, and disaster services. According to agency officials, the exchange makes evidence derived from agency work transparent and accessible to CNCS staff, grantees, and the public.
<b>U.S. Agency for International Development (USAID)</b>	Agency Programs and Functions Policy (ADS 101)	Automated Directives System (ADS) 101 (Agency Programs and Functions) establishes policy regarding the agency's programs, functions, and operations. It provides authority to the agency's pillar bureaus—the Bureaus for Food Security; Global Health; Economic Growth, Education, and Environment; and Democracy, Conflict, and Humanitarian Assistance—for leading evidence-building activities with regional bureaus and missions across the agency within the sectors they cover. USAID officials told us this includes developing learning agendas that span the agency.
	Development Policy (ADS 200)	ADS 200 (Development Policy) describes USAID's process of creating development policy. It states that a key principle of development policy is that it should be evidence-based. Furthermore, it states that evidence-based development policy should be developed through a collaborative process that includes technical experts from across the agency.
	Scientific Research Policy	According to USAID officials, the agency uses scientific research to strengthen the evidence base of its technical sectors, understand the complex challenges related to international development, develop innovative solutions to those challenges, and bring those solutions to scale. To guide this effort, USAID established an agency-wide Scientific Research Policy, which provides overarching guidance and mandates for the agency's research and development activities. These include establishing research design, ensuring quality standards, and ensuring public access to research products, among other things.
	Standard Foreign Assistance Indicators and Key Issues	USAID, in conjunction with the Department of State, establishes standard performance indicators and key issues that cover the scope of the agencies' operations to measure what is being achieved by foreign assistance funds and the collective impact of efforts to advance country development. The two agencies report on progress toward the indicators and on the key issues in their joint performance plan and report. According to USAID officials, each year the agency's Bureau of Policy, Planning, and Learning convenes specialists from across the agency to validate or remove existing indicators and key issues based on a consideration of the agency's evidence needs.
	Self-Reliance Metrics and Country Roadmaps	In April 2019, USAID updated its Policy Framework to reorient the agency's work around the "journey to self-reliance"—fostering capacity and commitment in partner countries so that they can solve their development challenges without USAID's assistance. USAID established a set of 17 standard self-reliance metrics, around which missions are to construct country self-reliance "roadmaps" intended to identify a country's capacity and commitment to achieving self-reliance. USAID intends to use data collected from these metrics to inform strategic decisions about country partnerships.

**Appendix IV: Additional Examples of Selected Agencies' Coordination of Evidence-Building Activities**

Agency	Evidence-building process	Description
	Evidence gap maps	USAID partnered with the International Initiative for Impact Evaluation (3ie) to construct evidence gap maps to identify knowledge gaps within specific sectors to prioritize evidence-building efforts. For example, in March 2017, 3ie found that in the areas of science, technology, innovation, and partnerships for development, little evidence existed on how macro-level policies and regulation affect the production of scientific research, access to digital technology, and the innovative behavior of private firms.
	Evidence warehousing	USAID has taken steps to ensure that evidence across the agency that has been generated through monitoring, evaluation, research, and development activities is effectively tracked, warehoused, and made available for use inside and outside the agency. For example, each year, bureaus and operating units within USAID that fund programs with foreign assistance funds must report evaluation data on planned, ongoing, and completed evaluations, which the agency uses for planning and reporting purposes. In addition, USAID policies establish that all data and publications generated by the agency must be deposited in databases that are open and accessible to the public.
	Proposed Bureau for Policy, Resources, and Performance	USAID proposed consolidating offices from across the agency responsible for evidence-building activities into a new Bureau for Policy, Resources, and Performance. This includes the offices that lead its evidence assessment (Bureau for Management) and prioritization (Bureau for Policy, Planning, and Learning) processes. According to USAID, the agency's budget, strategic planning, and program performance offices are disconnected under its current structure. The new bureau is intended to better align budget resources, development policy priorities, evidence-based country strategies, and program performance. As of June 2019, USAID was awaiting congressional committees' approval of this consolidation proposal.

Source: GAO analysis of agency information. | GAO-20-119

# Appendix V: Comments from the Corporation for National and Community Service



we describe below, address the GAO's three recommendations. CNCS's Strategic Evidence Plan outlines a series of activities to generate credible, relevant, and actionable information about the agency's organizational effectiveness and outcomes of its national service programs and, ultimately, it explains the extent to which CNCS is achieving its mission. This plan is designed to provide the agency's executive leadership, management team, and staff with the information needed for strategic learning and decision-making to ensure the efficiency and effectiveness of CNCS and its programs.

Included in the agency's Strategic Evidence Plan is the goal of strengthening how the agency prioritizes and uses its evidence. CNCS plans to develop and implement by end of FY20 a more formalized business process for using evidence to drive business decisions, allocate resources, and grow effective national service programs. Specifically:

- **CNCS will integrate evidence planning into its annual budget formulation process.** The agency's evidence plan is updated each year so that spend and acquisition planning is informed by what was learned in the previous fiscal year. Each office will include in their budget justification to the Chief Executive Officer (CEO) money allocated for evidence - building, the evidence to support their planned investments in participants, partnerships and projects, and evidence that needs to be further developed in the coming fiscal year.
- **CNCS will convene quarterly meetings that cascade from the annual budget formulation meetings conducted at the beginning of each fiscal year.** These quarterly meetings will be used to assess progress against the agency's evidence, spend and acquisition plans in order to manage agency resources more effectively.
- **The CNCS Impact Council will facilitate cross-agency planning and coordination for evidence building activities.** The Impact Council includes representatives from ORE, OIT, Office of Regional Operations, HQ Program Offices, HQ Operating Offices. Members of the Council will work together to design and use specific data, research and evaluation projects (e.g., identifying priority information needs, ensuring relevance of projects, and applying findings to practice).

Sincerely,

*Barbara Stewart*

Barbara Stewart  
Chief Executive Officer  
Corporation for National and Community Service

NationalService.gov



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## Text of Appendix V: Comments from the Corporation for National and Community Service

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Page 1

November 12, 2019

Ms. Michelle Sager Director, Strategic Issues

U.S. Government Accountability Office 441 G Street NW

Washington, DC 20548

Re: Response to GAO Report on CNCS Evidence-Building Activities (GAO 102782)  
Dear Ms. Sager,

Thank you for the opportunity to respond to the U.S. Government Accountability Office's (GAO's) report to Congress on Engagement 102782, Federal Agencies' Evidence-Building Activities. The Corporation for National and Community Service (CNCS) is providing the following responses to address the three Recommendations for Executive Action outlined in the draft report provided to CNCS on October 9, 2019. We understand that the GAO will provide CNCS with a final copy of the report, inclusive of CNCS's responses below.

GAO Recommendations for Executive Action:

- 1) Recommendation # 1: "The Chief Executive Officer of CNCS should develop an approach [to] ensure that all relevant participants are involved in the agency-wide process for prioritizing evidence needs.", p. 33
- 2) Recommendation # 2: "The Chief Executive Officer of CNCS should define roles and responsibilities for all relevant participants involved in the agency-wide process for prioritizing evidence needs.", p. 33
- 3) Recommendation # 3: "The Chief Executive Officer of CNCS should revise written guidance for the agency-wide process for prioritizing evidence needs to ensure it identifies all relevant participants and their respective roles and responsibilities.", p. 33

CNCS Response:

CNCS is pleased to share that it has developed and, in September 2019, published its first-ever Strategic Evidence Plan (available at <https://www.nationalservice.gov/documents/2019/new-cnccs-strategic-evidence-plan>). CNCS believes this plan and specifically the actions included in the plan that

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## Page 2

we describe below, address the GAO's three recommendations. CNCS's Strategic Evidence Plan outlines a series of activities to generate credible, relevant, and actionable information about the agency's organizational effectiveness and outcomes of its national service programs and, ultimately, it explains the extent to which CNCS is achieving its mission. This plan is designed to provide the agency's executive leadership, management team, and staff with the information needed for strategic learning and decision-making to ensure the efficiency and effectiveness of CNCS and its programs.

Included in the agency's Strategic Evidence Plan is the goal of strengthening how the agency prioritizes and uses its evidence. CNCS plans to develop and implement by end of FY20 a more formalized business process for using evidence to drive business decisions, allocate resources, and grow effective national service programs. Specifically:

- CNCS will integrate evidence planning into its annual budget formulation process. The agency's evidence plan is updated each year so that spend and acquisition planning is informed by what was learned in the previous fiscal year. Each office will include in their budget justification to the Chief Executive Officer (CEO) money allocated for evidence - building, the evidence to support their planned investments in participants, partnerships and projects, and evidence that needs to be further developed in the coming fiscal year.
- CNCS will convene quarterly meetings that cascade from the annual budget formulation meetings conducted at the beginning of each fiscal year. These quarterly meetings will be used to assess progress against the agency's evidence, spend and acquisition plans in order to manage agency resources more effectively.
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Sincerely,

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Barbara Stewart  
Chief Executive Officer  
Corporation for National and Community Service

# Appendix VI: Comments from the Department of Education



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF PLANNING, EVALUATION AND POLICY DEVELOPMENT

ASSISTANT SECRETARY

November 12, 2019

Ms. Michelle Sager  
Director, Strategic Issues  
Government Accountability Office  
Washington, DC 20548

Dear Ms. Sager:

Thank you for the opportunity to review the draft Government Accountability Office (GAO) report titled, "*Evidence-Based Policymaking: Selected Agencies Coordinate Activities, but Could Enhance Collaboration*" (GAO-20-199). The U.S. Department of Education (ED) is pleased to respond.

ED is committed to maximizing the performance of federally funded education programs in partnership with the broader education community, including students and families, community-based organizations, institutions of higher education, school districts, and states. Using, building, and disseminating evidence is critical. We appreciated Congress's interest and GAO's examination and determination that ED's evidence-building activities reflect leading practices for collaboration.

To further our efforts in this area and help fund evidence-building to improve postsecondary education, ED continues to urge Congress to include appropriations language establishing a new pooled evaluation authority to improve data collection and conduct rigorous research and evaluations of ED's postsecondary programs. The pooled evaluation authority is modeled after the authority in the Elementary and Secondary Education Act. The proposed authority would permit ED to reserve up to 0.5 percent of funding appropriated for each Higher Education Act program, except for the Pell Grant program and the Student Aid Administration account, to carry out evaluation activities.

The Foundations for Evidence-Based Policymaking Act of 2018 provides the opportunity for us to further the Administration's efforts, and we welcome the opportunity. ED is building on its efforts to date to develop a multi-year learning agenda and further strengthening data governance to advance our use of data as a strategic asset. We look forward to continued interest in this important work.

Sincerely

A handwritten signature in cursive script that reads "James C. Blew".

James C. Blew  
Assistant Secretary for Planning, Evaluation  
and Policy Development

400 MARYLAND AVE. S.W., WASHINGTON, DC 20202  
www.ed.gov

*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

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## Text of Appendix VI: Comments from the Department of Education

Ms. Michelle Sager

Director, Strategic Issues

Government Accountability Office

Washington, DC 20548

Dear Ms. Sager:

Thank you for the opportunity to review the draft Government Accountability Office (GAO) report titled, "Evidence-Based Policymaking: Selected Agencies Coordinate Activities, but Could Enhance Collaboration" (GAO-20-199). The U.S. Department of Education (ED) is pleased to respond.

ED is committed to maximizing the performance of federally funded education programs in partnership with the broader education community, including students and families, community-based organizations, institutions of higher education, school districts, and states. Using, building, and disseminating evidence is critical. We appreciated Congress's interest and GAO's examination and determination that ED's evidence-building activities reflect leading practices for collaboration.

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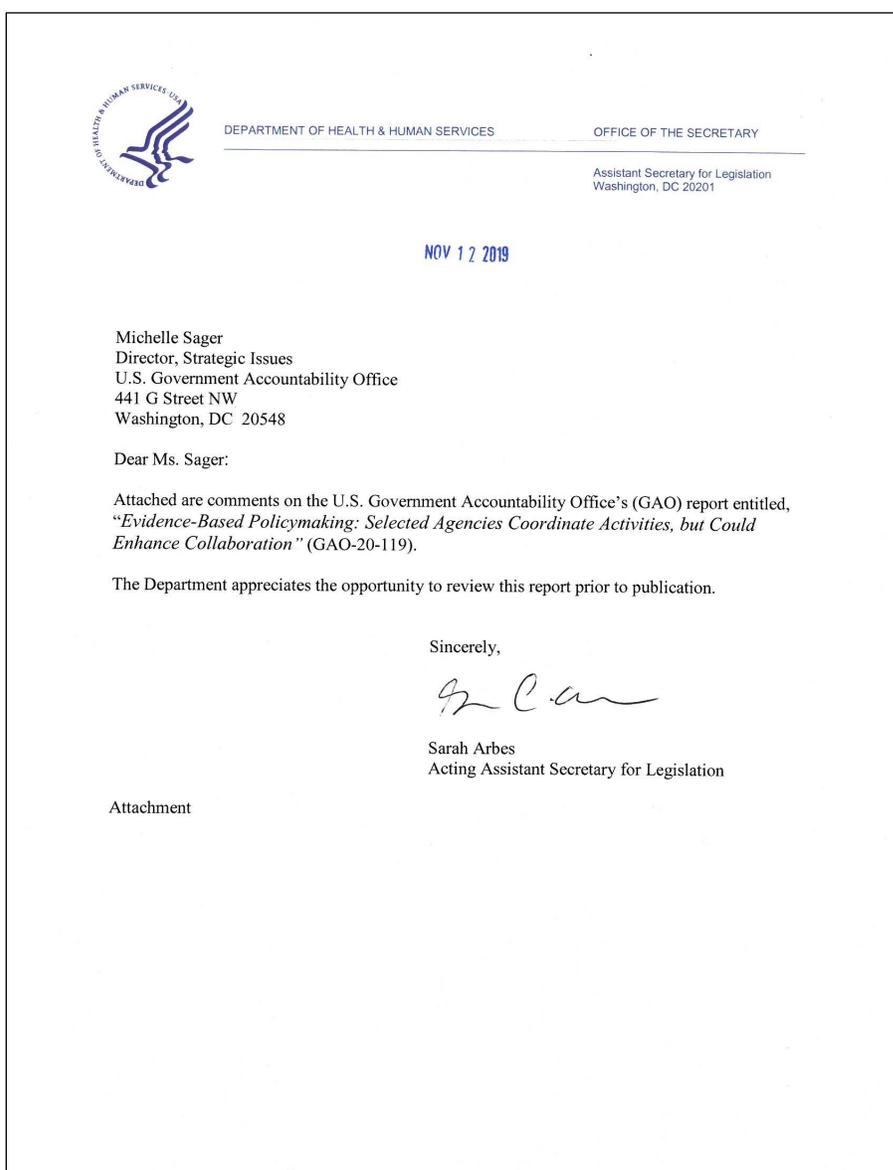
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Sincerely

James C. Blew

Assistant Secretary for Planning, Evaluation and Policy Development

# Appendix VII: Comments from the Department of Health and Human Services



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**Appendix VII: Comments from the Department  
of Health and Human Services**

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**GENERAL COMMENTS FROM THE DEPARTMENT OF HEALTH & HUMAN  
SERVICES ON THE GOVERNMENT ACCOUNTABILITY OFFICE'S DRAFT  
REPORT ENTITLED – EVIDENCE-BASED POLICYMAKING: SELECTED  
AGENCIES COORDINATE ACTIVITIES, BUT COULD ENHANCE  
COLLABORATION (GAO-20-119)**

The U.S. Department of Health and Human Services (HHS) appreciates the opportunity from the Government Accountability Office (GAO) to review and comment on this draft report.

**Recommendation 4**

The Secretary of HHS should develop an approach to ensure that all relevant participants are involved in the department-wide process for prioritizing evidence needs.

**HHS Response**

HHS Non concur. HHS have developed a process for including all relevant participants in a process for prioritizing evidence as mandated by the Foundations for Evidence-Based Policymaking Act of 2018.

**Recommendation 5**

The Secretary of HHS should revise written guidance for the department-wide process for prioritizing evidence needs to ensure it identifies all relevant participants and their respective roles and responsibilities.

**HHS Response**

HHS Non concur. HHS have developed a process for including all relevant participants in a process for prioritizing evidence as mandated by the Foundations for Evidence-Based Policymaking Act of 2018.

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**Text of Appendix VII: Comments from the Department  
of Health and Human Services**

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Page 1

Michelle Sager

Director, Strategic Issues

U.S. Government Accountability Office 441 G Street NW

Washington, DC 20548 Dear Ms. Sager:

Attached are comments on the U.S. Government Accountability Office's (GAO) report entitled, " Evidence-Based Policymaking: Selected Agencies Coordinate Activities, but Could Enhance Collaboration " (GAO-20-119).

The Department appreciates the opportunity to review this report prior to publication.

Sincerely,

Sarah Arbes

Acting Assistant Secretary for Legislation

Attachment

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Page 2

GENERAL COMMENTS FROM THE DEPARTMENT OF HEALTH & HUMAN SERVICES ON THE GOVERNMENT ACCOUNTABILITY OFFICE'S DRAFT REPORT ENTITLED - EVIDENCE-BASED POLICYMAKING: SELECTED AGENCIES COORDINATE ACTIVITIES, BUT COULD ENHANCE COLLABORATION {GAO-20-119}

The U.S. Department of Health and Human Services (HHS) appreciates the opportunity from the Government Accountability Office (GAO) to review and comment on this draft report.

**Recommendation 4**

The Secretary of HHS should develop an approach to ensure that all relevant participants are involved in the department-wide process for prioritizing evidence needs.

### **HHS Response**

HHS Non concur. HHS have developed a process for including all relevant participants in a process for prioritizing evidence as mandated by the Foundations for Evidence-Based Policymaking Act of 2018.

### **Recommendation 5**

The Secretary of HHS should revise written guidance for the department-wide process for prioritizing evidence needs to ensure it identifies all relevant participants and their respective roles and responsibilities.

### **HHS Response**

HHS Non concur. HHS have developed a process for including all relevant participants in a process for prioritizing evidence as mandated by the Foundations for Evidence-Based Policymaking Act of 2018.

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## **Page 3**

### TECHNICAL COMMENTS FROM THE DEPARTMENT OF HEALTH & HUMAN SERVICES ON THE GOVERNMENT ACCOUNTABILITY OFFICE'S DRAFT REPORT ENTITLED - EVIDENCE-BASED POLICYMAKING: SELECTED AGENCIES COORDINATE ACTIVITIES, BUT COULD ENHANCE COLLABORATION (GAO-20-119)

#### **Page 9, Second Paragraph**

The sentence concerning the number of evidence-based models is incorrect as written. While 20 models met the HHS criteria for an evidence-based early childhood home visiting model as of October 2018, only 18 of those models were eligible for the implementation with MIECHV funds. Two models were deemed not eligible for implementation with MIECHV funds because

1) one model had changed its service-delivery mode so that the majority of services were no longer provided through home visits; and 2) the other no longer provided implementation support, as reported by the model developer to HHS. Suggested language with additional clarification is below.

In the most recent review released in October 2018, while 20 models met the HHS criteria for an evidence-based early childhood home visiting model, only 18 of those models were eligible for the implementation with MIECHV funds.

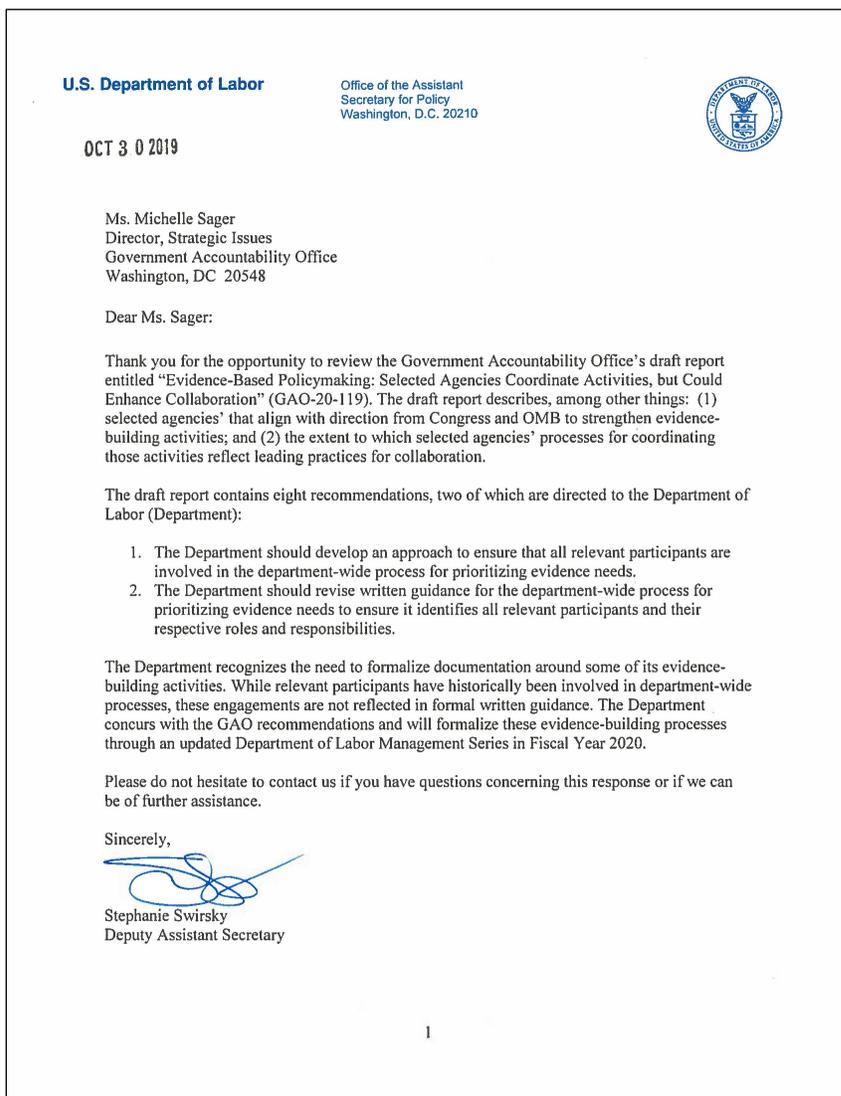
**Page 17, Footnote**

In the footnote 44 on p. 17 references Education but the paragraph concerns HHS. I'm not sure if GAO intended that or if it is an error, but the content does not seem to match.

**Page 44, Bottom of Page**

The description of the MIECHV program near bottom of p. 44 neglects to mention that tribes are eligible for MIECHV. I would change the description to say: "Provides states, territories, and tribal entities funds to administer local home visiting programs... "

# Appendix VIII: Comments from the Department of Labor



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## Text of Appendix VIII: Comments from the Department of Labor

Ms. Michelle Sager Director, Strategic Issues

Government Accountability Office Washington, DC 20548

Dear Ms. Sager:

Thank you for the opportunity to review the Government Accountability Office's draft report entitled "Evidence-Based Policymaking: Selected Agencies Coordinate Activities, but Could Enhance Collaboration" (GAO-20-119). The draft report describes, among other things: (1) selected agencies' that align with direction from Congress and OMB to strengthen evidence- building activities; and (2) the extent to which selected agencies' processes for coordinating those activities reflect leading practices for collaboration.

The draft report contains eight recommendations, two of which are directed to the Department of Labor (Department):

1. The Department should develop an approach to ensure that all relevant participants are involved in the department-wide process for prioritizing evidence needs.
2. The Department should revise written guidance for the department-wide process for prioritizing evidence needs to ensure it identifies all relevant participants and their respective roles and responsibilities.

The Department recognizes the need to formalize documentation around some of its evidence- building activities. While relevant participants have historically been involved in department-wide processes, these engagements are not reflected in formal written guidance. The Department concurs with the GAO recommendations and will formalize these evidence-building processes through an updated Department of Labor Management Series in Fiscal Year 2020.

Please do not hesitate to contact us if you have questions concerning this response or if we can be of further assistance.

Sincerely,

Stephanie Swirsky

---

Deputy Assistant Secretary

# Appendix IX: Comments from the U.S. Agency for International Development



NOV 12 2019

Michelle Sager  
Director, Strategic Issues  
U.S. Government Accountability Office  
441 G Street, N.W.  
Washington, D.C. 20226

Dear Mrs. Sager:

I am pleased to provide the formal response by the U.S. Agency for International Development (USAID) to the draft report produced by the U.S. Government Accountability Office (GAO) titled, *Evidence-Based Policy Making: Selected Agencies Coordinate Activities, but Could Enhance Collaboration* (GAO-102782).

We are proud GAO recognizes that USAID remains a leader among Federal Departments and Agencies in high-quality evaluation practices that inform the effective management of programs, demonstrate results, promote learning, support accountability, and provide evidence for decision-making. The findings in draft report GAO-102782 reflect USAID's commitment to comprehensive and integrated coordination for gathering and using evidence for policy-making. We appreciate that the report assesses that USAID's processes consistently address the four leading practices for collaboration identified by the GAO—leadership, participants, responsibilities, and guidance—and adhere to the highest standards for generating evidence.

These findings also correspond with the conclusions of other external reviews, most notably Results for America's 2019 Federal Standard of Excellence (<https://2019.results4america.org/>), in which USAID comes in second across nine Departments and Agencies for the use of evidence in decision-making, and the GAO's own report titled, *Federal Monitoring and Evaluation Guidelines Incorporate Most but Not All Leading Practices*, issued in July 2019, which found that USAID uses leading practices in monitoring and evaluation. The GAO and Results for America confirm the steady improvements USAID has made to strengthen our policies, practices, and culture to build and use evidence as we implement the Foundations for Evidence-based Policymaking Act of 2018.

I am transmitting this letter for inclusion in GAO's final report. Thank you for the opportunity to respond to the draft report, and for the courtesies extended by your staff while conducting this engagement.

Sincerely,

A handwritten signature in blue ink, which appears to read 'Frederick M. Nutt', is positioned above the typed name.

Frederick M. Nutt  
Assistant Administrator  
Bureau for Management

---

## Text of Appendix IX: Comments from the U.S. Agency for International Development

Michelle Sager

Director, Strategic Issues

U.S. Government Accountability Office 441 G Street, N.W.

Washington, D.C. 20226

Dear Mrs. Sager:

I am pleased to provide the formal response by the U.S. Agency for International Development (USAID) to the draft report produced by the U.S. Government Accountability Office (GAO) titled, Evidence-Based Policy Making: Selected Agencies Coordinate Activities, but Could Enhance Collaboration (GAO-102782).

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---

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Sincerely,

Frederick M. Nutt Assistant Administrator Bureau for Management

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# Appendix X: GAO Contact and Staff Acknowledgments

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## GAO Contact

Michelle Sager at (202) 512-6806 or [sagerm@gao.gov](mailto:sagerm@gao.gov)

---

## Staff Acknowledgments

In addition to the above contact, Benjamin T. Licht (Assistant Director), Daniel Webb (Analyst-in-Charge), Amanda Prichard, Kelly Turner, and Brian Wanlass made significant contributions to this report. Valerie Caracelli, Jacqueline Chapin, Ann Czapiewski, Steven Putansu, and Andrew J. Stephens also made key contributions.

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Orice Williams Brown, Managing Director, [WilliamsO@gao.gov](mailto:WilliamsO@gao.gov), (202) 512-4400,  
U.S. Government Accountability Office, 441 G Street NW, Room 7125,  
Washington, DC 20548

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## Public Affairs

Chuck Young, Managing Director, [youngc1@gao.gov](mailto:youngc1@gao.gov), (202) 512-4800  
U.S. Government Accountability Office, 441 G Street NW, Room 7149  
Washington, DC 20548

---

## Strategic Planning and External Liaison

James-Christian Blockwood, Managing Director, [spel@gao.gov](mailto:spel@gao.gov), (202) 512-4707  
U.S. Government Accountability Office, 441 G Street NW, Room 7814,  
Washington, DC 20548



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