Adding a program evaluation lens to retrospective analysis

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Background

• Foundations for Evidence-Based Policymaking Act of 2018 (Evidence Act) is bipartisan, bicameral legislation passed by the 115th Congress and signed on January 14, 2019.

• Provides a federal framework for agencies to work with stakeholders to promote a data-driven culture of evidence-building, evaluation use, continuous learning, and decision making using the best available evidence.

• Presidential Memorandum on scientific integrity and evidence-based policymaking, affirms the Biden Administration’s commitment to the Evidence Act. (Section 5)
Agency deliverables

- **Agency Learning Agenda** (EPA published 03/28/2022)
- **Capacity Assessment** (EPA published 03/28/2022)
- **Annual Evaluation Plan** (EPA will publish 04/04/2022)
- **Evaluation policy** (signed 03/25/2022, posted soon)
Evidence Act expectations

• Improve day-to-day operations, program design, and policy outcomes
• Build agency infrastructure for program evaluation
• Produce data, share data, and use data
• Engage internal and external stakeholders in a cycle of learning
  • Build and advance an agency culture of evidence-building
  • Involve academics and other government researchers
“Systematic analysis of a program, policy, organization, or component of these to assess effectiveness and efficiency.”

Source: OMB M-19-23, Evidence Act
Where evaluation has a retrospective lens

- **Process / Implementation Evaluation**
  During implementation, assess how program is being implemented or operating in practice

- **Outcome / Impact Evaluation**
  Assess if program achieved goals

**Formative Evaluation**

- **Needs**
- **Inputs**
- **Outputs**
- **Intermediate Outcomes**
- **Impact**

**Descriptive Studies**
Describe aspects of the program; prior to full implementation, assess if program is feasible, appropriate

Source: OMB M-20-12 (2020); CNCS. “How to Develop the Right Research Questions for Program Evaluation.”
Grappling with methodological challenges

- Inform new regulation with ex post learning about program and policy outcomes
- Plan for retrospective review at outset, e.g., rethink regulatory data schema to better anticipate ex post evaluation
- Design rules to allow natural experiments, and to allow for the intentional exploration of the relationship between programmatic mechanisms and regulatory outcomes
- Lay out theory of change
- Determine proper scope
- Measure causal relationship
Awareness
How do people become aware of the issue? Who frames the need or the challenge to be addressed?

Access and Distribution
Who has access to benefits? How are they designed, allocated, and distributed? How is eligibility defined?

Outputs and Quality
Who participates and who delivers the activities? How is the quality and consistency of the experience ensured?

Outcomes and Impact
Who benefits more or less?Were there unintended adverse consequences?

EQUITY CONSIDERATIONS

Problem
What is the need, challenge, or opportunity being addressed?

Inputs
What is needed to address it, including staff, infrastructure, expertise, funding, processes, materials, etc.?

Activities
What are the specific tasks, activities, functions, or processes that the agency or grantee will undertake to address it?

Outputs
What are the artifacts or products that should result from these activities that will be measured and tracked?

Outcomes
What are the expected results of these tasks, activities, functions, or processes?

Impacts
What effect(s) did the tasks, activities, functions, or processes have on the outcomes of interest?

LOGIC MODEL

ENGAGEMENT
Who was engaged and represented in each step of the process?

What did this engagement look like?

Where were opportunities for feedback loops?
Appendix
Relevant OMB guidance

- OMB M-21-27, Evidence-Based Policymaking: Learning Agendas and Annual Evaluation Plans
  - This is follow-on guidance to the January 27, 2021 Presidential Memorandum on Scientific Integrity and Evidence-Based Policymaking.

  - Practice 3: Establish, Implement, and Widely Disseminate an Agency Evaluation Policy
  - Evaluation Standards (One-Pager Quick Reference)
  - Evaluation Practices (One-Pager Quick Reference)
  - FAQs on OMB M-20-12


- OMB M-14-06, Monitoring and Evaluation Guidelines for Federal Departments and Agencies that Administer United States Foreign Assistance