

Summary of White House Office of Management Budget M-21-27: Evidence-Based Policymaking: Learning Agendas and Annual Evaluation Plans

June 30, 2021

Introduction

On June 30, 2021, the White House Office of Management and Budget published updated [guidance](#) on implementing the Foundations for *Evidence-Based Policymaking Act of 2018* (Evidence Act). This guidance responds to the [Presidential Memorandum on Restoring Trust in Government Through Scientific Integrity and Evidence Based Policymaking](#), issued by President Biden on January 27, 2021, and expands on previous OMB guidance, including [OMB M-19-23](#), [OMB M-20-12](#), and [OMB Circular A-11](#).

The Memorandum "affirms the Federal Government's commitment to the Evidence Act and to building and nurturing a culture of evidence and the infrastructure needed to support it." It expands on previous guidance to agencies to frame Evidence Act implementation as a government-wide evidence-based culture and infrastructure building effort. It also encourages agencies to leverage Evidence Act activities as opportunities to embed evidence into agency strategy and planning, and emphasizes that agency leadership, not just Evidence Act related personnel, are responsible for prioritizing evidence in agency operations. This guidance and the January [Presidential Memorandum](#) explicitly highlight the importance of data and evidence in advancing equity, and encourages agencies to consider rigor, transparency, and equity at every stage of their Evidence Act implementation activities. It particularly highlights two strategies to create an evidence-based culture -- creating leadership and using learning agendas and evaluation.

Why The Guidance Matters

This guidance reaffirms the Biden Administration's commitment to building an evidence-based government. The Evidence Act and its associated requirements have jumpstarted evidence-based policy expectations and set agency leaders up to build an evidence-based culture in their departments. This guidance directs agencies to view the Evidence Act as an opportunity to assess their current capacity and make plans to "use evidence to support processes like agency operations, grantmaking, human capital management and development, and program administration, as well as to support mission strategic areas, like program and service delivery." While this is a requirement for some agencies, OMB encourages all agencies, even non-CFO agencies, to engage in similar processes that embed evidence into their operational decision making. The guidance clarifies that sufficiently funded evaluation [activities can be paid for by federal grant programs](#). The guidance supports and aligns with Results for America's *Invest in What Works Federal Standard of Excellence* on capacity building and [evidence-based spending](#).

The Memorandum also reinforces previous OMB guidance with the recent [Presidential Memorandum on Restoring Trust in Government Through Scientific Integrity and Evidence Based Policymaking](#) which encouraged agencies to prioritize scientific rigor, transparency, and equity in the implementation of the Evidence Act and development of their Learning Agendas, Annual Evaluation Plans, and other evidence-building activities.

- **Scientific Rigor:** Agencies should ensure that their activities meet federal scientific standards. OMB suggests [a broad range of evidence collection approaches](#) agencies can consider, but specifies that OMB does not prefer one method over the other; rather, "agencies must use the most rigorous methods that are appropriate to answer the specific question(s) being asked given considerations like timeline, feasibility, equity, and resources."
- **Transparency:** Agencies are expected to prioritize transparency both in the release of findings and in the development and execution of evidence-collection activities. Transparency from the very beginning helps to preserve accountability and protects the integrity of evaluations by ensuring they are not "tailored to generate specific findings." In addition to publicly posting their Learning Agendas and Annual Evaluation Plans, agencies should, with privacy and national security considerations in mind, release findings as broadly as possible to inform evidence-based decision making within and across federal agencies.
- **Equity:** Equity should be a key consideration and component of evidence-building strategy and activities from the outset, through early, active, and consistent engagement with diverse stakeholders. Agencies should ensure that the focus on equity does not conflict with requirements for rigor and transparency but reinforces those efforts and ultimately improves agency function and program outcomes.

Leadership for Building an Evidence-Based Culture

Senior agency leaders can create an evidence-based culture in their department by leading their agency's evidence building practices and prioritizing implementation of the Evidence Act. OMB encourages agency leaders to use the Evidence Act as not simply a "compliance exercise" but as an opportunity to embed evidence-based decision making into the agency's core operations and strategic planning.

The Evidence Act requires CFO Act agencies and OMB guidance encourages non-CFO Act agencies to designate a [Chief Data Officer, a Statistical Official, and an Evaluation Officer](#). The Evaluation Officer should be "**a senior career employee** with the skills and expertise to maintain principles of scientific integrity throughout the evaluation process." Agencies should ensure that these individuals are not just qualified to conduct robust evaluations and generate usable information, but that these officials and their teams have sufficient time and resources to complete this work. Title I of the Evidence Act and the recent Presidential Memorandum both identify evaluation as a critical agency function. Agency leaders should anticipate and allocate sufficient

resources for program evaluation during the earliest planning stages, and use the results of these evaluations for continuous learning and improvement. Leadership should also identify opportunities to break down silos and encourage sharing evaluation results both within and across agencies.

Agencies should use their [Capacity Assessments](#) to identify any staff and resource deficits that could hinder their ability to conduct expansive and high quality evaluations. This information will not just identify any new staff needs to ensure they have sufficient staff numbers and skills to complete high quality evaluations, but help OMB and Congress understand where additional investment is required to promote evidence-based governance. [OMB notes](#) that areas of agency budget requests that cannot be justified with evidence are areas where the agency should prioritize building that evidence-gathering capacity and allocate resources accordingly.

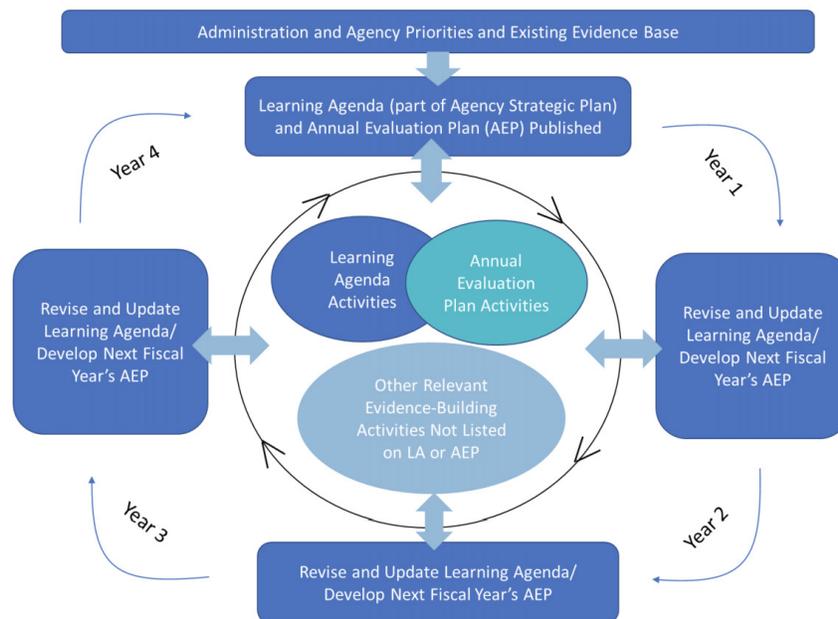
Making evidence building and evaluation mission critical activities requires agencies to dedicate significant funding for evaluations. OMB recommends agencies support their evaluations using [diversified funding sources](#), including "department-wide, working capital, or similar funds that leverage contributions across the agency; a portion of program funds (particularly for agency priorities and large investments); set-asides in statute for evaluation; and partnerships with other Federal agencies with shared goals and missions." Planning agency strategy, budgets, and evidence-building activities in tandem can allow for complex, multi-year evaluations of the agency's work and improve their function. Agencies can also use their [grant application and award processes](#) to incentivize and subsidize evidence-building by awarding larger investments to programs with stronger evidence of effectiveness.

Learning Agendas and Evaluation Plans

Learning Agendas and Annual Evaluation Plans are a critical opportunity for agencies to use the requirements of the Evidence Act to go beyond compliance and develop an evidence-based culture. These documents are intended to plan for and design "evidence-building activities that, in turn, will produce evidence that will inform and shape subsequent priority questions." This guidance expands on the four broad types of evidence agencies should plan to collect (foundational fact finding, policy analysis, program evaluation, and performance measurement) to [specify the methods agencies should consider using](#), including but not limited to "pilot projects, randomized controlled trials, quantitative survey research and statistical analysis, qualitative research, ethnography, research based on data linkages in which records from two or more datasets that refer to the same entity are joined, well established processes for community engagement and inclusion in research, and other approaches that may be informed by the social and behavioral sciences and data science."

Agencies should ensure that Learning Agendas and Agency Strategic Plans are informed and shaped by the other, building evidence collection and evidence-based decision making into the core of the agency's mission and activities. When preparing agency Strategic Plans, Learning Agendas, and Annual Evaluation Plans, agencies should be sure to engage relevant staff such as the Evaluation Officer, Chief Data Officer, and Statistical Official to ensure they are using the "most rigorous methods that are appropriate" to answer the identified priority questions and build the evidence required. Future iterations of the Learning Agenda, Annual Evaluation Plan, and Agency Strategic Plan should integrate results from previously generated evidence and identify the agency's strategy to continue collecting evidence to deliver better results, as seen in [Figure 2](#):

Figure 2:
The Evidence Cycle



Stakeholder engagement is a critical component of developing these plans, and OMB once again stresses the importance of going beyond minimum compliance with Evidence Act requirements. Agencies should consult a [wide variety of stakeholders](#) to ensure they collect a diverse range of viewpoints that inform and improve their core work, and should consider additional engagement methods, including but not limited to "community engagement, participatory research methods, listening sessions or focus groups, technical working groups, [and] one-on-one consultations." Stakeholder engagement is also an important opportunity to "advance equity and meet the needs of underserved communities," and should be thoughtfully planned and executed in order to promote transparency and build trust in the agency's operations.