

**THE COALITION FOR EVIDENCE-BASED POLICY:  
ITS IMPACT ON POLICY AND PRACTICE**

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This paper is a report on an inquiry into the work of the Coalition for Evidence-Based Policy. The Coalition's mission is to promote government policymaking based on rigorous evidence of program effectiveness. It is a strong supporter of randomized controlled trials (RCT) as a key means of identifying highly effective social interventions. The method of inquiry was telephone conversations with personnel in several federal agencies that the Coalition has worked with, some members of the Coalition's Board of Advisors, and others with knowledge of the Coalition's activities at the Federal and State levels. The key issue addressed in this study was what impact the Coalition's work has had, and what impact those interviewed expect its ongoing work to have, on advancing evidence-based policy reforms in their agencies/institutions. All those interviewed were informed that their comments were not for attribution. Reports issued by the Coalition and agency documents related to the Coalition's activities were also examined.

## **I. INTERVIEWS**

A number of issues were raised in the course of the interviews, but most of the discussions coalesced around one or more of three topics: (a) the Coalition's relationships with federal agencies; (b) reservations and concerns about some Coalition activities; and (c) suggestions for improving and expanding the Coalition's operations.

### **A. Agencies**

The Coalition has spent considerable time and effort with three federal agencies to promote the adoption of evidence-based evaluations of program performance and of randomized controlled trials as the preferred way to conduct such evaluations. The agencies are the Office of Management and Budget (OMB), the Department of Education (Education), and the Department of Justice (Justice). Those interviewed agreed that the Coalition had been a major factor in advancing the cause of evidence-based policy within these agencies. Of equal significance, according to a number of participants, was the adroitness shown by the Coalition in the techniques it used in dealing with the governmental bureaucracies.

There was unanimous praise for the competence, zeal, high quality, and professionalism of the Coalition's staff and their ability to work with the agencies in a cooperative manner. No agency personnel appear to have felt coerced or pressured; partnership has been the dominant theme. The single word that those interviewed used most frequently in describing their relations with the Coalition was "collaborative". Dealing with multiple bureaucracies with different institutional imperatives is not easy; the Coalition seems to have handled this task very well.

The most impressive and significant set of relationships developed by the Coalition has been with the Office of Management and Budget. Through the mechanism of an OMB/Coalition committee, the instructions issued by OMB to the agencies for its Program Assessment Rating Tool (PART) were revised. (PART is a systematic method of assessing the performance of programs across the federal government and is currently

a key tool in OMB's review of agency budget requests.) The amended guidance stated that "randomized controlled trials are generally the highest quality, unbiased evaluations to demonstrate the actual impact of a program." The instructions also stressed the importance of rigorous, well-designed studies if randomized controlled trials were not feasible. Further, OMB issued guidance to all agencies entitled "What Constitutes Program Effectiveness?"; randomized controlled trials was the first method of evaluation listed. This guidance was also one of the results of the OMB/Coalition committee. Another product of the OMB/Coalition collaboration was the establishment of an Interagency Program Evaluation Working Group, with members from OMB and several agencies, that will focus on ways to implement the new OMB guidance. Finally, OMB is considering including a section on evidence-based reviews in its Circular A-11, which provides the basic instructions to all agencies on the materials to be submitted to OMB in support of the agencies' requests for funds to be included in the President's Budget.

Many of those involved or aware of the OMB/Coalition effort stated that gaining the active support of this key agency had given the Coalition significant leverage in dealing with other Federal departments and agencies. They believe that the guidance documents issued by OMB -- aligning the use of rigorous evidence in evaluating Federal programs with PART and the annual budget process -- and establishing an interagency committee have the potential to build a permanent structure for evidence-based evaluations. One participant remarked that the Coalition had helped OMB move from an emphasis on "independence" in Federal agencies' program evaluation activities (i.e., requiring agencies to use qualified third parties to conduct program assessments) to "quality". The Coalition has not just influenced OMB policy pronouncements at a single point in time; it has also helped create some government-wide practices and procedures that could endure for many years to come.

In the case of the Department of Education, the Coalition was, according to those interviewed, equally adept in establishing a favorable policy environment for evidence-based program evaluations and suggesting concrete approaches to carry out such evaluations. The first step was a Coalition report, issued in November 2002, which recommended a strategy to advance evidence-based education policy. That report was discussed at a major forum attended by the Secretary of Education, Department staff and senior officials from other departments. One of the recommendations made in the report was that the Department give additional points in evaluating applicants for funds under its discretionary grant programs to those that propose to carry out randomized trials. A senior staff person at the department said that Education had told applicants for funding in several programs that they could get up to 20 additional points for including RCT evaluations in their proposals; as a result, in one \$100 million program, 30% of the applicants had such a provision in their applications. He asserted that this was an example of the Coalition's ability to assist agencies to devise workable ways to make rigorous evidence-based evaluations a part of their programs. In November 2003, Education published for public comment proposed rules to establish, on a Department-wide basis, a priority for program projects with an evaluation plan that uses "an experimental design under which participants... are randomly assigned to participate in the project activities being evaluated or to a control group...."

The Coalition also produced a report for the Department entitled “Identifying and Implementing Educational Practices Supported by Rigorous Evidence: A User-Friendly Guide”. Education hosted a conference of State and local education officials to discuss the report, distributed it to State Education Agencies and put it on the Department’s website. The result, according to an agency official, has been that the Department ran out of printed copies and received an enormous number of inquiries about the report from State and local education officials through the website. One long-time observer of the Department commented that the Coalition had been instrumental in taking general support for evidence-based research among some Education officials and demonstrating some practical ways of incorporating this approach in the Department’s programs.

The evidence-based movement in education policy also appears to be gaining the attention of other members of the education and scholarly communities. In September 2003, with financial support from Education and several foundations, the Committee on Research in Education of the National Research Council held a workshop on “Implementing Randomized Field Trials in Education”. The report of the workshop is available on the Council’s website (<http://books.nap.edu/catalog/10943.html>).

A similar pattern is being followed in the Coalition’s initiative with the Department of Justice. The Coalition began working with the Department in January 2003. Meetings with policy officials and staff from Justice and other agencies with crime and substance abuse programs were sponsored by the Coalition to encourage agencies to “carry out rigorous studies ... to build the knowledge base of research-proven crime and substance abuse interventions... [and]... “spur the widespread use of research-proven interventions by recipients of federal crime/substance abuse funding.” In December 2003, the Coalition issued a report with a recommended federal strategy for “Bringing Evidence-Driven Progress to Crime and Substance-Abuse Policy”. In June 2004, Justice and the Coalition convened a forum attended by policymakers, agency staff from Justice, Education, OMB and other agencies, researchers, and other officials to discuss such a strategy. One outcome of this effort has been the creation of a Website in Justice with information about programs that are effective in addressing crime and substance abuse problems. Another has been an interagency effort to define common terms in these areas. The Coalition was credited by Justice officials and staff for providing the impetus for getting such activities underway and for sponsoring close collaboration among the agencies.

The Coalition was commended by several persons for its skillful use of forums in Education and Justice to advance its efforts. The attendance of agency policy officials in those meetings was a signal to the bureaucracies involved that promoting rigorous evidence-based evaluations must be taken seriously. The participation by staff from several agencies can assure those involved that they are part of an emerging “community” and that they can contact other agency staff for advice on dealing with common issues and evaluating programs in different agencies that are focused on similar problems and populations. These forums also provided the Coalition with a means of attracting new “customers”, e.g., Justice officials who attended some of the Education

meetings became interested in working with the Coalition to bring evidence-based program evaluation to their department.

Most of those interviewed for this study were associated with Executive branch agencies; however, a few were involved in the Coalition's activities with the Congress and at the State level. In the Congress, the Coalition has developed contacts with Senate authorizing and appropriation committees and with House appropriations subcommittees. It played a key role in convincing the appropriations committees to increase funding for research for the Department of Education in both fiscal years 2003 and 2004. Some Executive branch personnel even urged that the Coalition expand its contacts with the Hill. They feared that progress in the Executive branch agencies could be negated if the congressional authorizing and appropriations committees were not aware of and sympathetic to evidence-based program evaluations. At the State level, a discussion between the Governor of Arizona and Coalition staff culminated in a decision by the Governor to request State department heads to demonstrate what evidence-based interventions justify the budget submissions they will make for fiscal year 2005 in several program areas.

## **B. Reservations**

Reservations about certain aspects of the Coalition's work were expressed during several interviews. These comments were made in the context of support for the principle of evidence-based program evaluations and randomized controlled trials.

One concern was that the Coalition was too thinly staffed to fulfill its purpose, particularly if it had any intention of expanding the scope of its activities at the Federal or State levels. What still needed to be done would, it was felt, overwhelm the current resources of the Coalition.

Others believed that the Coalition has not faced a true test of its approach and techniques because it has not yet had to convince a skeptical audience of the merits of its mission. In their view, OMB was "fertile ground" for any group offering a means of evaluating federal programs: since OMB has historically faced the problem of judging among numerous agency claimants for funding, it was receptive to a set of ideas that appeared to offer a new and better way of discriminating among those claimants. According to such critics, policy officials in Education and Justice also had histories of support for rigorous evaluation of federal programs; the Coalition was, in effect, preaching to the already converted. One agency policy official asserted that the Coalition's presentations were to a "more than willing audience."

There were reservations among some of those interviewed about the importance that the Coalition placed on RCT as the "gold standard" of evidence-based evaluations. They claimed that there are many Federal activities (e.g., certain large, complex, multi-billion dollar grant programs) for which randomized controlled trials do not make sense. They contended that no detailed guidance had been given on the specific circumstances in which RCT could or could not be effectively applied to Federal programs; and that there were many instances in which it was not appropriate. Others asserted that randomized

controlled trials only applied to a minority of Federal programs. For example, they stated that direct, controlled experiments were often better in the military and physical science arenas. From this perspective, the Coalition should have a more balanced portfolio -- it should be assisting agencies to adopt methods other than RCT and be a guide to adopting rigorous evaluation methods even in those agencies and programs where RCT is not the right model.

Some agency personnel fear that the commitment to the Coalition's views is only "skin-deep" among most agency staff, that there exists considerable skepticism and misunderstanding below the policy and senior staff levels in the agencies. A policy official in one agency who is strongly committed to the Coalition's vision and work believes that, assuming no setbacks, it could be three to four years before there is adequate understanding and support for evidence-based activities at all levels in the agency. A senior staff person in another agency said that everyone should recognize that a "long, educational process that would take years" was required for success.

A related concern was that even in those instances where there was a substantial amount of understanding of and support for evidence-based evaluations, Federal staffs were seriously lacking in the skills needed to judge such proposals, and local applicants were deficient in the expertise needed for their design and application. One agency staff person contended that making the case for the importance of RCT "was relatively easy, but now the really hard work" had to be done -- actually making it happen -- and that people with the necessary skills were in very short supply. A July 2004 "roundtable" meeting convened by the Coalition between the interagency Working-Group mentioned in section I.A. of this paper and an OMB/Council on Excellence in Government Rigorous Evidence Working Group offered some confirmation of this view. One of the themes of the meeting was that "There is a need to build agencies' and programs' capabilities (i.e., knowledge, skills, resources) to carry out rigorous evaluations and effectively use rigorous evidence."

A similar concern was voiced over the lack of broad support from the field for conducting randomized controlled trials. Section I.A. of this paper noted that Education published for comment proposed rules providing a preference for randomized controlled group trials in evaluating federally funded education programs. In response, the Department received hundreds of letters objecting to the rules, including statements from the American Evaluation Association, the American Educational Research Association, and the National Education Association (NEA). The NEA, for example, while agreeing "with the premise that all education programs should require scientifically rigorous evaluations to demonstrate program effectiveness", claimed that the proposed rules "may have a chilling effect on innovation in education". There is no evidence that the Department is going to retreat from its endorsement of randomized controlled trials because of such objections, and Education also received a number of letters endorsing the rules. However, some agency staff believe that this incident indicates the amount of work that still needs to be done to inform the education community about the merits of RCT.

Finally, some agency personnel stated that the cost and complexity of RCT projects was a potentially major obstacle to its acceptance in the government. They feared that agencies would be loathe to request, and Congress slow to provide, an adequate level of funding for these projects when they have to satisfy so many other claimants for funds in the context of the current federal budget deficit. Others claimed that, because of the need to deal with the deficit, both the Executive and Legislative branches will be tempted to use any negative information about a program, however derived, as a reason for eliminating or reducing the funding for the program. If program evaluations arising from an RCT design provide such information, the Coalition may come to be viewed by program supporters, interest groups and factions in the Congress as just another tool to destroy or cripple favored Federal activities; it could consequently find itself beset by a host of detractors.

### **C. Suggestions**

In the course of the interviews, several recommendations were made on ways in which the Coalition might improve its effectiveness. Some were made in an attempt to address concerns raised in the previous section; others were advanced in the hope of expanding the Coalition's range of activities. It was suggested that the Coalition could:

- Sponsor the development of teams of practitioners and researchers at the local level to design and implement evidence-based projects. Proponents of this view contend that such teams would help alleviate the lack of expertise among applicants for federal program funds in local communities.
- Offer training programs for Federal staff. There were several comments to the effect that promulgating a policy of evidence-based program evaluations in an agency is only the first step in a long and difficult process. Agency staff with the necessary technical skills and knowledge to evaluate proposals from the field are in very short supply. Good staff training programs are needed to insure that evidence-based policies are effectively implemented.
- Reach out to other organizations with aims similar to the Coalition and make them part of the process. Two rationales were offered for this suggestion: (1) it would help to further demonstrate the bipartisan, objective nature of the Coalition's activities; and (2) it would enable the Coalition to leverage its resources. One agency policy official stated that U.S. foundations generally do not base their funding priorities on the results of rigorous evaluations and suggested that the Coalition attempt to convince a group of foundations (over and above those already supporting it) to fund RCT activities in the public sector.
- Try to interest and engage a significant number of Congressional staff in the Coalition's activities. This suggestion was based on the view that, because of the complex structure of Congress with its myriad committees and subcommittees, obtaining broad-based Congressional support will be a lengthy task. If staff from a number of authorization and appropriation committees were convinced of the

merit of the Coalition's work, it would make the job of getting and keeping such support much easier.

## **II. OBSERVATIONS**

The preceding sections of this paper have described the Coalition's activities from the viewpoint of those interviewed in the course of this project. This section, while reflecting some of those opinions, will offer the author's observations.

Based on the interviews, I believe that the Coalition has been successful, mainly through its activities with OMB, in contributing to the creation of a government-wide framework that can align evidence-based evaluations with the process of formulating the President's Budget. It has also been instrumental in transforming a theoretical advocacy of evidence-based activities among certain agencies into an operational reality. Even those who had reservations about certain aspects of the Coalition's work had nothing but praise for its success in building a constituency for evidence-based program evaluations. To its credit, the Coalition has accomplished a considerable amount in its less than three years of existence. This development could reap great benefits for the rigorous review of federal programs in the years ahead.

However, it is too soon to know with any certainty whether evidence-based program evaluations will be widely accepted and endure as an integral component of policy and practice in the Executive branch and the Congress. There are many more agencies and bureaucracies yet to be contacted. One current illustration of the hurdles that remain to be surmounted is the recent action of a House appropriations subcommittee in reporting out the FY 2005 appropriation bill for its agencies. The subcommittee report directed the agencies funded in the bill "to refrain from including substantial amounts of performance data within the budget justifications themselves, and to instead revert to the traditional funding information previously provided." The fact that it will take time to judge the ultimate success of the Coalition should not be a surprise nor should it be seen as a criticism of the Coalition's efforts to date. Bureaucracies have always been quite slow to change their mode of operations; it would be unrealistic to expect the rapid acceptance of rigorous program evaluations in the agencies or the Congress.

A difficulty that the Coalition may have to face is the possible development of a false set of expectations about what randomized controlled trials can achieve. Agency staff often believe that there should be a one-to-one relationship between an "approved" (e.g., by OMB) system of evaluating programs and the policy and funding decisions made about those programs. However, policy imperatives, political concerns, program priorities, and resource constraints have traditionally been more important factors in the decisions regarding the fate of federal programs than reliance on the results of evidence-based analyses. There is no reason to believe that this is likely to change soon. The Coalition has not been asserting anything to the contrary in its advocacy of RCT, but it will have to be careful that some of its agency supporters do not put a greater burden of expectations upon this method of evaluating programs than it can sustain.

Finally, the Coalition may have to struggle to convince agencies that rigorous evidence-based evaluations are an innovation that will last. Because of the large number of government-wide policy, program, management and budget “reforms” that have disappeared after being energetically promoted for a few years as the latest “solution” to the problem of ineffective or outmoded programs, there is an abiding institutional skepticism in many agencies over the worth of any new government-wide system. Many career staff are convinced that all such attempts are doomed to fade away.

In the light of these concerns, suggestions and observations, the Coalition may wish to consider several options in planning for the future.

First, it could continue on its present course with basically the same approach, number of staff and level of resources. It could rely on OMB to be the prime advocate for evidence-based program review and randomized controlled trials throughout the government and use its resources to assist agencies to develop the specific competencies needed in implementing such reforms. It would not have to work with many agencies at the same time, allowing some to “graduate” from the Coalition’s guidance after they had achieved an acceptable degree of expertise. It would continue to write reports, sponsor conferences, etc. The advantage of this option is that it allows the Coalition to capitalize on its demonstrated strengths; the possible disadvantage is that it may not be a broad-gauged enough effort to address the opportunities and problems attendant on reaching its goals. This would be particularly true if the Coalition wants to expand significantly its operations in the Executive branch, the Congress or the States.

Another alternative would require the Coalition to increase its activities substantially. Following up on some of the suggestions made in section I.C. of this paper, the Coalition could attempt to establish and administer training programs for Executive and Legislative branch staff, assist agencies to devise evidence-based assessments other than RCT where that is appropriate, aid local communities to put together scholar/practitioner groups that could develop programs for Federal funding with a strong RCT component, and work simultaneously with a range of Federal, State, and local entities to further the cause of evidence-based program evaluations. In short, it would become, in effect, a “full service” organization. This option would obviously require a considerable expansion of resources, in terms of both funding and staff. It might also require the Coalition to become a more complex, layered organization. This option would permit the Coalition to reach a broader audience with a larger intellectual and organizational “toolkit” in hand, but it could also result in creating a Coalition that was bureaucratic and unwieldy. Obtaining the level of resources and the number of qualified personnel that this option implies might not be possible.

A third option would be to form alliances with other organizations or sponsor networks that are or could be interested in supporting evidence-based analyses of Federal, State and local programs. For example, the Coalition might put together a network of experts and make this network available through phone contact or the Internet to local and State programs and projects that needed assistance in designing and applying RCT in various settings. It might try to collaborate with certain organizations in developing training

programs for Federal, State and local staffs assigned to evaluate evidence-based evaluations. Working in cooperation with other groups, the Coalition might be able to orchestrate the concentration of a significant amount of funding and personnel on this issue without having itself to become much larger in size or complex in structure. While appealing in theory, it is not clear whether there are enough other organizations with the resources, interest and necessary skills to make this a realistic alternative. Further, it might require the Coalition staff to spend most of their time and energy on coordinating activities; it is not at all certain that this prospect would appeal to the type of personnel that the Coalition needs to carry out its mission.

One person said that joining with the Coalition to advance understanding and implementation of RCT was “doing God’s work”. The Coalition has made some dramatic progress in its proselytizing efforts in government and it has impressed the “converts” with its zeal and enthusiasm. However, the government has many precincts, much remains to be done, and the forces of indifference and institutional inertia are strong. The Coalition now needs to decide the best way to continue spreading the faith.