

Tools That OMB Examiners Can Use To Advance Rigorous Program Evaluations and the Use of Evaluation Findings in OMB/Agency Decision-Making

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By trade and training, OMB examiners are among those most interested in learning the quality of program results and efficiency of achieving them, and applying that knowledge to the decision-making process. This makes most of them advocates for objective evaluations to determine program results. This has always been true of examiners over the years, and is especially true since implementation of the President's Management Agenda element on Budget and Performance Integration (BPI), whose success standards emphasize results; and the Program Assessment Rating Tool (PART), which highlights the use of objective evaluation to demonstrate results.

Interest and formalized emphasis alone, however, do not get evaluations developed, funded, and their findings used, either for programs as a whole or for specific interventions or techniques within programs. To advance these goals, examiners have access to a wide range of tools and techniques that can help enlist agency and OMB officials and staff in support of high quality evaluation. Not all the tools are suitable all the time or for all programs or situations, so deciding which to use and when is an important part of the craft of examining.

Some people inside and outside of OMB will offer a range of excuses in opposition to doing rigorous evaluation, regardless of the tools outlined below. The most common arguments they use and how examiners might successfully fend them off are outlined in the Addendum to this paper.

This paper summarizes approaches that have proven successful in getting a high quality evaluation designed, funded and implemented, and its results used in the decision-making processes. It is intended as a general guide to help examiners when discussing options with supervisors and with agency personnel.

1. Find a partner in the agency who will work with you to advance rigorous evaluations and the use of evaluation findings.

There are often agency staff at the career and political level who are enthusiastic about evaluation, respond quickly and positively to the notion or can be persuaded of its efficacy. These people become invaluable inside advocates. It is occasionally possible for OMB to force an agency to plan and carry out a high quality evaluation against its will, but it takes much more effort and the agency has multiple opportunities to frustrate the endeavor.

The partner can be in a budget office or planning and evaluation office, an assistant secretary or a career program manager, a Schedule C, or any other person of influence. The examiner doesn't need to care who, only that the advocate be a person of influence and respected – getting an enthusiastic person lined up with whom influential people in the agency won't cooperate is of little value.

On balance, a long-term career person may be the best partner because he or she expects to be working in the area longer than most political appointees. On the other hand, it often takes an interested political appointee to overcome entrenched career staff resistance to something that may change the status quo. Examiners need a good sense of these dynamics before engaging the issue.

2. Use quarterly assessments of agency progress on the President's Management Agenda (PMA) to advance rigorous evaluations and the use of evaluation findings.

The PMA highlights the importance of achieving results most aggressively in the success standards for Budget and Performance Integration (BPI) and in the Program Assessment Rating Tool (PART) process. The emphasis is also present in the other elements, especially Human Capital and Financial Management.

Examiners can use the quarterly assessments of agency progress on PMA elements to keep a strong focus on evaluation. This can help generate agency support for higher ratings through the development and funding of rigorous evaluations and the use of their findings in the agency internal decision-making processes and the agency's interactions with OMB and Congress.

See section 4 below for the discussion of PART.

3. Use the process for developing and submitting legislation to Congress.

Administrations vary widely in how much overt influence they let OMB exert on the processes of developing legislation to submit to Congress and participating in negotiations on authorizing, mandatory spending, tax expenditure, and appropriations bills with agencies and in Congress. If this window is open, examiners can work toward obtaining in legislation provisions that authorize high quality evaluation for new and for on-going programs, as well as funding for such studies.

If the OMB Circular A-19 process is being used to coordinate authorizing and tax bill clearance (it sometimes is not), examiners can seek to get such language adopted through that process. If an examiner's Program Associate Director (PAD) is a key player in an appropriations or other bill, the examiner can help develop the PAD's interest in evaluation.

If the window is not generally open, experienced examiners with extensive contacts in the agency can try to achieve the same thing through informal influencing of agency interaction with Congress. Even if an administration does not send up bills or overtly leaves drafting to Congress, agency experts are virtually always engaged at some level in the process and if they are working toward the same evaluation goals as the examiner, can be successful using this route to obtain evaluation authorization and funding.

In any of these situations, examiners need to be familiar with general bill language for authorizing and funding evaluation that can be tailored to a particular situation. Templates can be found on the Evidence-Based Policy Help Desk website (www.evidencebasedpolicy.org).

4. Use the process for developing the President's budget.

Examiner interactions with agencies and OMB leadership occur throughout the development of the President's Budget, offering multiple opportunities to influence development and use of evaluations.

- **Program Assessment Rating Tool (PART).** Development of PART assessments, or revisits to earlier assessments to determine progress on corrective actions, usually occurs months in advance of the agency budget submission. Because PART emphasizes objective evaluation so strongly, this is a critical opportunity for examiners to support or influence agency willingness to engage in high quality evaluation.

Because the PART process is as much an internal management tool as a budgetary tool, this is also a prime occasion for the examiner to explain to the agency how he or she responds to the presence or absence of high quality evaluation and its use in judging program management effectiveness for both PART scoring and PMA ratings.

Agencies need clarity on their own examiner's view of and use of evaluation, over and above the general OMB guidance on the subject.

- **Overview hearings.** OMB sometimes begins the formal interaction with the agency on the fall budget submission with an overview hearing with a senior officer, such as the Deputy Secretary. If that occurs, it is a good opportunity to prepare the lead OMB official with one or two questions about launching or responding to a major evaluation, or to express high level OMB support for evaluation efforts in general. Some officials prefer a wrap-up overview, which can serve the same purpose.
- **Written questions to the agency,** based on the fall submission, are usually the first formal communication to the agency on the full range of issues of interest to OMB for that budget year. Questions should be included about why evaluations and evaluation findings are or are not in the submission. Answers need follow up during hearings or other later interactions.
- **Hearings with agency officials and staff.** Most years, most Resource Management Offices (RMOs) hold formal hearings with senior agency officials and staff. These face-to-face give and takes are usually of central importance in figuring out what the agency really cares about, and thus are good settings for raising questions about funding requested or not requested for evaluation, about the use of findings of recent evaluations, and about the impact of evaluations on agency thinking.
- **Passback.** OMB passes back initial OMB decisions to the agency orally and sometimes in writing. This passback can include how OMB used evaluation findings or the lack thereof in formulating these decisions, and what additional evaluations are to be included in the President's budget.
- **Appeals and negotiations,** which usually follow passback. Agency challenges to OMB's use of evaluation, and disagreements with OMB proposals for new, continuing, or termination of evaluations can all come up. Some negotiations occur at the examiner level, others at the level of the OMB Branch Chief, Division Director, Program Associate Director, OMB Director and deputies, and at the White House staff and Presidential

level. Examiners need to be alert to openings at all these levels to emphasize views on the use of evaluation and funding for evaluation.

At any level, initiation of an important evaluation can be a bargaining chip on either the agency side (e.g., to forestall a program termination or cutback) or for OMB (e.g., to obtain agreement for a major evaluation in return for concessions on an agency priority).

- **Allowance letters.** Some years, OMB codifies major budget decisions in an Allowance Letter to the agency head. Budget decisions on initiation or continuation of a major study can be included to elevate them to the agency head's attention. If an agency has been particularly good about funding evaluation and using evaluation findings to guide policy recommendations, that should also be highlighted.

5. Use budget execution tools.

The key budget execution tool is the formal or informal requirement for OMB approval of a spending plan for evaluation and research money by the agency, made a condition of approval of apportionment of funds. The formal authority is found in Title 31 of the U.S. Code, based on the Anti-Deficiency Act. These provisions require, among other things, that funds be apportioned to agencies in a manner intended to prevent spending in excess of authorization and to achieve greatest efficiency.

In practice, this gives OMB the authority to annotate an apportionment so as to require spending plan approval prior to expenditures. Such plans can go in to greater detail than the usual "time period" (quarterly, annually, semi-annually, etc.) apportionment approach. A plan for evaluation funds, for example, could require that each planned study costing more than, say, \$1 million, be separately justified, or that there be "stop and look" points in time to assure high quality study design before commitment of all funds.

Because violations of apportionment controls carry specific penalties and reporting requirements, this authority is not used lightly. With a cooperative agency, the same end can be accomplished through negotiation for such a plan and informal agreement to assure time for OMB review and approval before fund commitment. In the midst of so many other responsibilities, getting the evaluation plan in time for adequate review is essential and can be achieved through use of the apportionment tool or agreement to a timely plan in lieu of use of that tool.

6. Use the process for reviewing agency data collections.

The requirement for agencies to clear significant study designs with OMB prior to initiating the study is an important opportunity for examiners to engage on the quality of study design and its value to the quality of programming and to the decision-making process. This tool has to be used in concert with OMB's Office of Information and Regulatory Affairs (OIRA) to be most effective.

Unfortunately, an agency may not involve the examiner or OIRA until substantial sums have been committed to a contractor, meaning that any effort to improve a study design can cause contract issues and delays and wasted money. The use of an annual plan for studies, discussed in section 5 above, can help focus attention on the key studies in a timely manner. An agency may use the threat of wasted money to try to forestall examiner efforts

to improve a study; this should be resisted. Timely spending on a poor study is usually a much bigger waste.

Examiners often will not have the time to look at every study to try to figure out the quality of the design. A form of triage is likely needed to sort out the studies to focus on the studies of greatest policy significance or heaviest resource investment. The Evidence-Based Policy Help Desk (www.evidencebasedpolicy.org) offers significant assets that can save the examiner time and bring to bear high quality assistance.

Examiners and OIRA should try to have in place with the agency an understanding about timely submission of clearance packages and adequate opportunity for OMB input. Some agencies routinely package all studies the same, not identifying studies with tight timelines or highest importance until most of OMB's response time has expired, hoping to force a quick reply with minimal review. Examiner credibility in this arena is built by responding in as timely a manner as possible to clearance requests for high priority studies.

7. Other useful tactics.

- a. **Build and use relationships with influential interest group leaders.** Experienced examiners often have good ties to such leaders. If these leaders are not threatened by the notion of evaluation (some are), they can be important external influences on the agency and on Congress in support of evaluations. At minimum, examiners need to know how such people will react and work with the agency to build support and soften potential resistance.
- b. **Build and use relationships with influential congressional staff of both parties,** many of whom serve across Congresses. These people may be another source of influence in favor of evaluation and certainly should be cultivated to forestall possible objections.
- c. **Cultivate agency Inspector General staff and GAO staff as allies.** Individuals in these offices have not always been open to working with (as opposed to critiquing) OMB examiners or agency staff but seem increasingly so, and on evaluation issues should be supportive.
- d. **Respond effectively to press inquiries about studies.** Sometimes, individuals in the trade or general media will query examiners about a major study in negotiation, in progress, or which has generated an important report. Examiners usually get such queries through the press office. They need to have their stories straight about the study, its importance, and its role in decision-making. On the latter, some in the media will not understand that an evaluation, whether favorable or critical, is still just one input into decisions, and may need to be educated on the complex mix of inputs and influences on decisions.

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Of all these tools and techniques, none is more important than #1, personal relationships.

OMB has enormous influence on agency behavior in any administration through all the other tools and techniques identified here, but OMB and agency priorities often vary widely.

Without a partner on the other end, the examiner advocate for evaluation may be “pushing on the end of a string” – the examiner’s mightiest shove at one end translates into little or no movement at the other unless there is a partner at the other end to grab hold and pull.

Addendum
Excuses for not doing rigorous evaluation

Excuses for not doing a rigorous evaluation can come at examiners from inside or outside OMB. They need to be anticipated:

- **“Why rock the boat?”** This argument is usually offered when the program to be studied is a stated administration priority, or it is a large program with diverse purposes and activities and a long history of funding success without regard to demonstrated results. In the first instance, OMB policy level agreement with doing an evaluation needs to be expressed to the agency. In the second instance, such programs can have powerful allies in Congress and among grantees and contractors, among emotionally committed interest groups, and even among agency program people who are “sure” no study can change current policy. They do not want to “waste” time and money or anger supporters. A strong and persistent OMB policy-level commitment may be needed to overcome this excuse.

One approach to program evaluation that can sometimes help engage the program allies as partners in the evaluation – rather than adversaries – is to focus the evaluation on determining which interventions (i.e., projects, practices, or strategies) funded by the program are effective and which are not. This approach may be particularly suitable for large programs that fund an array of interventions (e.g., a federal drug-abuse prevention program that funds many different school-based interventions, such as DARE, LifeSkills Training, Project Alert, etc). An evaluation strategy focused on the various interventions within the program can produce valid, actionable knowledge about what works that the program can then use to strengthen its overall performance. Program allies -- rather than regarding such an evaluation as a threat – may indeed regard it as helpful tool for program improvement.

- **“We haven’t enough money; we have better uses for what we do have.”** Some agencies have significant sums for evaluation; most do not. Rigorous studies are not always more costly than less rigorous studies, but they can be. Rigorous studies often compete for funds with less costly, but scientifically-weaker, evaluation proposals, and possibly with other (non-evaluation) activities. Examiners can invoke OMB and Congressional emphasis on the importance of objective determination of results to help raise the priority of high quality evaluation in the competition for funds. There is usually someone of consequence in an agency who values demonstrated evidence of effectiveness.

In many cases randomized controlled trials (RCTs) can be done at low cost – sometimes as low as \$50,000-\$100,000 – especially if the study can legitimately be limited to measuring outcomes using administrative data such as arrest rates, student test scores on state exams, etc. See the OMB guidance on [What Constitutes Strong Evidence of a Program’s Effectiveness](#), pages 11-12, for examples. The Evidence-Based Policy Help Desk also gives examples of creative strategies that a program can use to get grantees to spend their grant funds on rigorous evaluations – instead of, or in addition to, the program’s using its scarcer evaluation funds to conduct the evaluation (e.g., see the U.S. Education Department’s [Striving Readers program solicitation](#)).

- **“Program deliverers (federal staff, grantees, contractors) will oppose the study and disrupt delivery; it isn’t worth the effort to try to overcome this.”** This can be true at the outset, but can usually be overcome with focused effort stressing the value to the program of being able to demonstrate its results objectively. Most agency staff, grantees

and contractors want to run effective programs. Their fears can be overcome. The agency program office (once convinced itself) needs to find allies among program operators to help argue the case. The resistance in any case is not an acceptable bar to finding out if a program is worth the money spent on it.

If resistance to a full program evaluation is too intense, this can be an opportunity for the less threatening alternative approach suggested above: the use of a structured set of smaller but still rigorous studies to determine which interventions within a program are the most effective.

- **“Evaluation findings are usually late and ambiguous.”** Good studies often do take time, and program legislation or management approaches can change in the interim. If the study demonstrates that the intervention studied did or not have the desired impact, that is still valuable information for decision-makers; not all legislative and management changes are necessarily the right thing to do.

Some impact studies can start producing useful information quickly. Examples: a reading intervention’s effect, if it exists, should appear within a year or so; crime/substance abuse prevention programs for youth typically should start producing impacts on criminal referrals, substance use, and so on, within a year or so. The longer-term follow-up is still important, but the shorter-term information can have important policy relevance.

It can be true that an important study ends with investigators unwilling to assert strong findings to guide decision-making, preferring to say “more research is needed.” The perfect being the enemy of the good, however, you may wish to mine such studies for actual findings vs. investigator equivocation in the conclusion. The “good” is sufficient for most decision-making, if not for researcher purity.

- **“OMB has higher priorities for staff time.”** Examiners are often under heavy pressure to meet short term deadlines. Time needed to orchestrate a study may in fact not be available despite workload triage. PART and Budget and Performance Integration (BPI) emphasis on results can help free up time, but pursuing an evaluation may be impractical for the time being. Fortunately, examiners have a long time horizon. They can keep the idea of evaluation alive, if on a back burner, until circumstances change or their arguments in favor of the study can prevail.
- **“There isn’t enough time to complete the study given the intended use of its findings.”** Though sometimes just a ploy to forestall a study, this may well be true. Designing, funding, completing and interpreting the results of evaluations, whether of big complex programs or of smaller interventions, all take time. Enthusiasm for a study for a specific decision point (e.g., an upcoming re-authorization) will not succeed if the time needed is simply not adequate. Examiners need to forecast the need for results data (final or interim) and initiate the process in a time frame that makes sense to the agency and thus helps obtain cooperation.