U.S. Department of Education Evaluation Policy

Introduction

The *Foundations for Evidence-Based Policymaking Act of 2018* (the Evidence Act) and subsequent guidance from the Office of Management and Budget (OMB) require agencies to establish and implement an agency-wide policy governing the design and conduct of evaluations.[1,2] At the Department of Education (ED), evaluations include, but are not limited to, efforts that are designed to rigorously test the efficacy or effectiveness of education policies, programs, or practices (impact evaluations) and those that describe how those policies, programs, or practices operate in classrooms, schools, and communities (implementation evaluations).

Consistent with the Evidence Act and OMB guidance, this policy outlines the key principles that guide ED's planning and conduct of its own evaluations. These principles should inform, but do not govern, evaluations undertaken by ED grantees of their own projects.

ED undertakes evaluations so that it can better meet its mission of *promoting student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access*. Evaluation findings build knowledge critical to the development of education as a field and serve as an important source of information for ED's own organizational learning and improvement. Taken together, these activities contribute to a larger goal of improved outcomes for all learners.

Program evaluations are only one source of evidence used by ED to support decision-making. Thoughtful and rigorous policy analysis, statistical data collections, foundational fact finding, and programmatic oversight activities such as performance measurement and monitoring can also yield high-quality evidence that may be used to promote mission-strategic and agency-operational improvement.[2]

Evidence-building and its use at ED is a shared responsibility. Every ED principal operating component (POC) is expected to use the best-available evidence in the conduct

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[1] See 5 USC § 312.

[2] See OMB Memorandum M-20-12, available at https://www.whitehouse.gov/wp-content/uploads/2020/03/M-20-12.pdf

of its work. Each POC should consider how its programs, policies, and practices—including those supported through grants and contracts—could be structured to build evidence to strengthen those activities in the future. However, no office is expected to undertake evidence-building and use alone. ED leverages both POC-specific expertise as well as agency-wide collaborations to develop and support the application and use of evidence in implementing its mission of educational excellence and equity.

The Institute of Education Sciences' (IES') National Center for Education Evaluation and Regional Assistance (NCEE) contributes to these efforts through the design and execution of rigorous program evaluations and the dissemination of evaluation findings. Congress established IES and NCEE as part of the *Education Sciences Reform Act of 2002* (ESRA; Pub. L. 107-279), directing NCEE to "conduct evaluations of Federal education programs administered by the Secretary … to determine the impact of such programs."[3] When NCEE is not directly sponsoring an evaluation, it fulfills its statutory mission by examining "evaluations conducted or supported by others in order to determine the quality and relevance of the evidence of effectiveness generated by those evaluations."[4] Through ESRA, Congress set high standards for the independence, relevance, quality, transparency, and ethics of IES evaluation activities—standards that are mirrored in OMB's guidance on program evaluation standards and practices.[5]

This policy affirms ED's commitment to the foundational principles identified in OMB guidance on program evaluation: independence and objectivity, relevance and utility, rigor and quality, transparency, and ethics. The policy also describes how those principles are implemented in NCEE evaluation activities.

Independence and Objectivity

If stakeholders are to use evaluations to inform their decision-making, they must view evaluation findings as trustworthy. IES's autonomy confers significant benefit to the Department, helping to earn and maintain public trust in the credibility of ED evaluation

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[3] See 20 USC § 9561(b)(2).
[4] See 20 USC § 9563(a)(1)(E).
[5] See OMB Memorandum M-20-12, available at https://www.whitehouse.gov/wp-content/uploads/2020/03/M-20-12.pdf

findings.

NCEE makes full and routine use of the autonomy granted IES and takes added steps to protect independence and objectivity in the design, conduct, analysis, and reporting of its evaluations by:

- Competitively awarding evaluation contracts to experts external to ED who are free from conflicts of interest, financial or otherwise.

- Consistent with ESRA, conditioning the release of evaluation reports only on approval from the IES Standards and Review Office (SRO), rather than the approval of the Secretary or any other ED office.[6] ESRA requires that IES evaluation reports are subjected to rigorous peer review before being released to the public.[7] SRO, which is independent of NCEE, oversees the scientific peer-review process. It seeks to ensure that IES reports are not only of high scientific merit[8] but also objective, secular, neutral, and non-ideological, as well as free of partisan political influence and racial, cultural, gender, or regional bias.[9]

- Releasing all reports to the public as soon as practical once approved by the SRO, irrespective of other ED or Executive Branch activities.

Relevance and Utility

In order to be useful, evaluation findings must be relevant to the interests and needs of ED and program leadership and staff; agency partners such as States, territories, tribes, and grantees; Federal, State, and school district policymakers; legislators and regulators; school boards and community organizations; parents and families; and other interested audiences.

While remaining fully committed to the autonomy granted to it by ESRA, NCEE seeks to ensure the relevance of ED evaluations by:

- Building strong partnerships with policy and program leaders to: create

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[6] See 20 USC § 9576(a)
[7] See 20 USC § 9576(c)
[8] See 20 USC § 9563
[9] See 20 USC § 9514

opportunities to identify evaluation topics and questions of importance; provide periodic progress updates while the evaluation is underway and opportunities to participate in Technical Working Groups (TWGs); share insights and interim findings from evolving research as it is undertaken, subject to the considerations below; inform policy and program leaders about final findings once the evaluation is completed; and understand effective mechanisms for sharing findings with interested stakeholders outside of ED.

- Ensuring that evaluation activities are prioritized in a manner consistent with the ED's Learning Agenda and considering: congressional requirements; the President's and Secretary's budget and policy priorities; State, district, and local needs as identified by ED staff; the evaluability of a program or overall feasibility of the evaluation effort; and how recently a program's last evaluation occurred.

- Reviewing the literature, consulting with experts, and seeking the input of key education stakeholders so that evaluations can generate relevant evidence for audiences both inside and outside of the Department.

- Ensuring that all evaluations are conducted in a timely manner and findings are reported promptly, without sacrificing quality.

- Ensuring that the products developed as part of an evaluation activity are responsive to the information needs and communication preferences of key stakeholders.

Considerations for Sharing Interim Findings from Evaluation Studies with ED Staff

Consistent with its goal to ensure evaluation findings are both relevant and timely, NCEE will share selected interim findings from evaluation activities when doing so could inform specific deliberations (e.g., grant competition design, budget policy, regulatory development, legislative proposals). To ensure standards of quality and rigor (below) are upheld, NCEE will only share interim findings based on completed data collections and analyses that have been subject to internal quality assurance procedures.

To maximize efficiency, NCEE will share such interim findings during regularly scheduled program briefings with policy and program leaders and may also be limited by

available staff and contractor resources. Interim findings will also be shared at regularly scheduled TWGs, to which program leaders are typically invited. All interim findings must be accompanied by a statement from NCEE indicating their scientifically appropriate and inappropriate uses, including the risk that findings may materially change prior to publication.

ESRA requires peer-review of evaluation studies and Secretarial notification before findings are shared with the public. ED staff may not redistribute any interim findings received from NCEE for any purpose.

Rigor and Quality

NCEE adheres to the highest possible standards of rigor and quality for conducting evaluations so that stakeholders can rely upon their findings. Because quality standards change over time as evaluation science and statistical practice evolves, IES promulgates guidelines and other standard operating procedures to ensure NCEE's evaluation work consistently reflects best practice among Federal evaluators.

ED expects all impact evaluations will be designed to meet What Works Clearinghouse™ standards, either with or without reservations. NCEE may also require evaluations to meet additional ED guidelines related to information quality, such as those required by the *Information Quality Act*.[10]

The standards below apply to all types of evaluation. They are applicable to all stages of an evaluation, including design, data collection, data analysis, and reporting of results.

- When an evaluation seeks to answer questions about the effectiveness of a policy, program, or practice, NCEE strongly prefers experimental designs.[11] The design of both impact and implementation evaluations and planned analyses must be aligned with the research questions of interest to yield credible findings.

- NCEE recruits and maintains an evaluation workforce with training and

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[10] See the Treasury and General Government Appropriations Act of 2001 (Pub. L. 106-554, § 515(a)), as codified at 44 USC § §3504 (d) and 3516.

[11] See 20 USC § 9563(a)(2)(A)

experience appropriate for planning and overseeing a portfolio of high-quality evaluations. NCEE staff have relevant advanced degrees and experience in a range of relevant disciplines and content areas, and NCEE leadership assigns staff to evaluations that best fit their areas of expertise. NCEE provides professional development opportunities so that staff are current with methodological advances and research in their content areas.

- NCEE ensures that contractors who conduct evaluations have the expertise needed to perform high-quality work. As part of the procurement process, NCEE first specifies requirements for contractor expertise designed to ensure a rigorous evaluation and then assesses the technical merit of proposals to ensure that well-qualified contractors are selected. NCEE staff closely oversee the entirety of the evaluation and supply technical direction to contractors on a frequent basis.

- NCEE convenes a TWG for each evaluation it conducts. Members include leading experts from both inside and outside government with relevant subject-matter, methodological, and practice expertise. TWGs supply periodic guidance to NCEE staff and the contractor during the design, analysis, and reporting phases of the evaluation.

- As required by ESRA, evaluation reports are subjected to a rigorous peer-review process before being published or otherwise released to the public. The peer-review process ensures that all reports are thoroughly vetted by scientific experts for scientific merit before publication. Procedures for peer review of reports are approved by IES's board, the National Board for Education Sciences.

Considerations for Evidence-Building Conducted by ED Program Participants

When possible, ED will require grantees (including through cooperative agreements) and contractors to conduct or commission rigorous evaluations of their activities and report their findings to ED and the public. A recent example is the Office of Elementary and Secondary Education's *Education Innovation and Research* (EIR) program and the development of "exit evidence" at the conclusion of the grant period.

Where appropriate, ED expects these evaluations to also meet What Works

Clearinghouse™ standards, with or without reservations. Inclusion in the Clearinghouse helps ensure that what is learned in an evaluation can benefit the field. However, program offices must consider their capacity to provide or support grantee technical assistance before requiring evaluation activities.

When the capacity to support rigorous evaluation does not exist, program offices should consider requiring grantees to conduct other evidence-building activities. These could include, but are not limited to, participation in rigorous performance monitoring and improvement activities or the collection of institution-level or student-level data to demonstrate the association between program participation and important program outcomes.

<u>Transparency</u>

ED promotes transparency of its evaluation work throughout a project's lifecycle.

First, consistent with the *Paperwork Reduction Act*, NCEE files Information Collection Requests with OMB and publishes the same in the Federal Register. These filings include information about an evaluation's purpose and benefits to stakeholders, as well as key statistical and operational details concerning how ED will conduct the evaluation.

Second, NCEE pre-registers analysis plans for all impact evaluations. Examples of study registries include the [Registry of Efficacy and Effectiveness Studies](), maintained by the University of Michigan's Inter-university Consortium for Political and Social Research.

Finally, NCEE releases all evaluation reports as soon as practical to ensure that government leaders and the public have access to completed evaluations. Each report includes a full accounting of data collection and analysis activities. NCEE posts final evaluation reports to the IES website and deposits them in the Education Resources Information Center, IES's online database of education research, to ensure that they are permanently available to the public.

NCEE also posts brief profiles of ongoing and recently completed evaluations on its website. The profiles provide pertinent information about each evaluation, such as its cost, anticipated timeline, background and purpose, evaluation questions, methods, data collection, and key findings. ED includes similar information in its Annual Performance Report. Findings from NCEE evaluations are also regularly shared via social media,

presented at conferences, and otherwise made available to relevant stakeholders.

Consistent with ESRA's requirement for data availability,[12] NCEE makes the data from its evaluations available to qualified individuals for the purpose of reproducibility and secondary analysis via the IES Restricted Use Data Licensing Program, maintained by the National Center for Education Statistics. NCEE adheres to all applicable laws that protect the confidentiality and privacy of education data, including the requirements explicitly set forth in ESRA.[13]

ED is also transparent about this evaluation policy and its efforts to collect and use high-quality data and evidence of all kinds. This and other relevant policies, including ED's Information Quality Act Guidelines, are made available on ED's websites. As part of the assessment required by the Evidence Act, ED staff regularly review their consistent adherence to ED's evaluation policy and other guidelines on evidence-building and use.

Ethics

ED and contractor staff who oversee scientific activities have a responsibility to behave in an ethical manner and to safeguard the dignity, rights, safety, and privacy of study participants. These responsibilities are outlined in ED's Scientific Integrity Policy, to which all ED staff are expected to adhere.[14] An important component of those safeguards is the development and use of high-quality data management practices that ensure the collection, processing, storage, and dissemination of data and data products are appropriate. NCEE routinely collaborates with colleagues across ED, including those with responsibilities for information security, student privacy, and data governance, to design work that complies with all applicable law and policy.

ESRA places special emphasis on protecting the confidentiality of individually identifiable information about students, families, and schools (Sec. 182-183). Other Federal laws, such as the *Family Educational Rights and Privacy Act* and the *Individuals with Disabilities Education Act*, similarly protect the privacy of student education

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[12] See 20 USC § 9574.
[13] See 20 USC § 9573.
[14] For more information on the Department's policy, see https://ies.ed.gov/aboutus/scientific_integrity.asp.

records.[15] IES evaluations comply with these laws, as well as other relevant requirements, such as regulations governing the Protection of Human Subjects (34 C.F.R. Part 97) and the Protection of Pupil Rights Amendment (PPRA; 34 C.F.R. Part 98).

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[15] For more information on FERPA, see https://www2.ed.gov/ferpa.