PROGRAM EVALUATION PRINCIPLES AND QUALITY STANDARDS

- 1. **REASON FOR ISSUE:** To establish the Department of Veterans Affairs (VA) Evaluation Policy.
- 2. **SUMMARY OF CONTENTS/MAJOR CHANGES:** Identifies key principles, requirements, and roles/responsibilities for VA program evaluations.
- 3. **RESPONSIBLE OFFICE:** Office Enterprise Integration (OEI) (008), Planning and Performance Management (PPM) (008A).
- 4. **RELATED HANDBOOK:** Not applicable.
- 5. **RESCISSION**: Not applicable.

CERTIFIED BY:

BY DIRECTION OF THE SECRETARY

OF VETERANS AFFAIRS:

/s/ Guy T. Kiyokawa Assistant Secretary for Enterprise Integration

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PROGRAM EVALUATION PRINCIPLES AND QUALITY STANDARDS

1. PURPOSE. Establishes an enterprise-wide Department of Veteran's Affairs (VA) Evaluation Policy. This Directive applies to all program evaluations, as defined by Office of Management and Budget (OMB) Circular A-11 and detailed in OMB M-20-12, conducted at VA. Evaluation of Departmental programs and activities will foster improvement in VA's ability to deliver the best outcomes for Veterans, their families, caregivers, and survivors. VA is committed to conducting evaluations and using evidence from them to inform policy and practice.

- 2. POLICY. The Foundations for Evidence-Based Policymaking Act of 2018 (the "Evidence Act"), P.L. 115-435, was enacted on January 14, 2019. The Evidence Act requires agencies to "advance program evaluation as an essential component of Federal evidence building." Program evaluation is defined as "an assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency." While specific program evaluations are required in various applicable laws and Congressional reports, VA may also conduct evaluations of major acquisition programs, other programs, and policies that in the judgment of VA leaders are significant and are likely to benefit from such evaluation.
 - The following principles and standards must be applied to all VA's program evaluation activities. They are consistent with guidance in OMB's M-20-12 and M-21-27 and reflect evaluation best practices across government agencies.
 - (1) Rigor. All VA evaluations must be planned, implemented, and interpreted by qualified evaluators with relevant knowledge, skills, and experience for the evaluation methods undertaken. Evaluation planning must consider the availability of evidence and gaps in evidence. All VA evaluations must be designed and carried out using widely accepted scientific principles and methodologies that are most appropriate for the evaluation's objectives, timeline, feasibility, and available resources. Evaluation conclusions must be directly supported with reliable and high-quality information.
 - (2) **Relevance and Utility**. Evaluation priorities must consider 1) legislative requirements, 2) needs of leadership, 3) potential impact of evaluation results on outcomes especially at the Veteran level, 4) staffing resources, and 5) data availability. The amount, reliability, and quality of data used in evaluations, and the resulting findings and dissemination thereof, must be proportional to the anticipated impact of the evaluation.
 - (3) **Transparency.** VA is committed to complete transparency in the planning, execution, and completion phases of all evaluations to enable full accountability to stakeholders. As such the VA must:
 - (a) Release results of all evaluations that are not prohibited from disclosure.

(b) Actively disseminate published results and evaluation products of its findings as appropriate and applicable.

- (c) Produce information on methods, results, and conclusions in such a way that they are verifiable and reproducible.
- (4) **Equity.** VA evaluators must ensure the full range of stakeholder perspectives and voices are gathered to inform and refine the question(s) at hand. Feedback from relevant stakeholders will help to inform design decisions including evaluation methods, data collection and analysis, recommendations for the application of evaluation results, and dissemination of evaluation products. Equity must be considered as evaluators design and execute studies, including, the development of the theory of change, selection of methods, collection of data, creation of analysis plans, and finalizing dissemination of products and reporting. Early, active, and consistent engagement with stakeholders who can represent a diverse set of perspectives and experiences is critical so that evidence-building activities can yield high-quality insights without inadvertently perpetuating underlying biases.
- (5) Independence and Objectivity. VA evaluators must engage a broad range of relevant stakeholders in setting evaluation priorities, identifying evaluation questions to be answered, and assessing the implications of findings. However, the evaluators are empowered to operate with an appropriate level of independence from programmatic, regulatory, and policymaking activities. Evaluators must be insulated from any political or other undue influence that may affect their objectivity, impartiality, and professional judgement. VA evaluators must have the necessary authority to protect their independence and objectivity in the design and conduct of evaluations, and in the interpretation and dissemination of findings.
- (6) Ethical Practice. VA evaluations must be conducted ethically and must safeguard the dignity, rights, safety, and privacy of subjects. Evaluations must comply with both the spirit and the letter of relevant requirements such as regulations governing research involving human subjects. Use of VA data for evaluations must adhere to the VA's "Ethics Principles for Access to and Use of Veteran Data".

3. RESPONSIBILITIES.

- Assistant Secretary for Enterprise Integration shall establish the program evaluation policy.
- b. Under Secretaries, Assistant Secretaries, and Other Key Officials shall:
 - (1) Ensure compliance with this program evaluation directive across the given Administration or Staff Office, including the principles and standards and all

- related instructions for planning and conducting program evaluations and disseminating and using their findings,
- (2) Appoint individuals, as needed, with expertise in evidence building and program evaluation to advise, manage, and/or conduct Administration or Staff Office evaluations and participate in the VA Evidence Working Group.
- (3) In coordination with the EO, engage in the processes and development of deliverables required under Title I of the Evidence Act.
- (4) Develop the Administration or Staff Office's capacity for program evaluation management and methods in coordination with and under the technical leadership of the EO.
- (5) Sponsor, endorse, and conduct, as needed, evaluations relating to programs, policies, regulations, and/or organizational entities that address priorities in the VA Strategic Plan and advance priority questions in the VA Learning Agenda.
- (6) Integrate program evaluation and other evidence-building plans and findings from the Department's deliverables under Title I of the Evidence Act into the development of Administration or Staff Office Long Range or Operating Plans, Annual Performance Plans, Agency Priority Goals, budget submissions, supplemental and out-of-cycle resource requests, and other such planning efforts.

c. Agency Evaluation Officer shall:

- (1) Serve as the Accountable Executive for Evaluation.
- (2) Execute the duties and responsibilities of the Evaluation Officer as outlined in the Evidence Act, OMB M-19-23, "Phase 1 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Learning Agendas, Personnel, and Planning Guidance" and OMB M-20-12, "Phase 4 Implementation of the Foundations for Evidence-Based Policymaking", to wit, overseeing or conducting:
 - (a) Assessments of the coverage, quality, methods, effectiveness, objectivity, scientific integrity, and balance of the portfolio of evaluations, policy research, and ongoing evaluation activities of the agency, in consultation with other methodologists, such as the Statistical Official, when appropriate,
 - (b) Improvement of agency capacity to support the development and use of evaluation, coordinate and increase technical expertise available for evaluation and related research activities within the agency, and improve the quality of evaluations and knowledge of evaluation

- methodology and standards, and dissemination of evaluation findings,
- (c) Required coordination, development, and implementation of the requirements under the Evidence Act,
- (d) Development of new, or improvement of existing, processes to integrate evaluation findings into agency decision-making and other functions, and
- (e) Use and dissemination of evaluation results throughout the agency and to the public, as appropriate.
- (3) Consult and coordinate electronically with the Department's Chief Data Officer, Chief Science Officer, Scientific Integrity Officer, and Performance Improvement Officer on the development and release of program evaluation plans, evaluation reports/summaries, and action plans/reports on the use of findings, as well as the promotion of secondary uses for such data and findings.
- (4) Establish and oversee Department-wide implementation of this program evaluation directive.
- (5) Support the integration of program evaluation and other evidence-building plans and findings from the Department's deliverables under Title I of the Evidence Act in the development of the VA Strategic Plan, Agency Priority Goals, Annual Performance Plans and Reports, Budget Submissions, and other planning efforts.
- (6) In addition to participating in the VA Data Governance Council, coordinate with the VA Statistical Official, Chief Data Officer, Senior Agency Official for Privacy, the Chief information Security Officer to establish frameworks and mechanisms to ensure that the creation, collection, use, processing, storage, maintenance, dissemination, disclosure, and disposition of data for evaluation is permissible, responsible, and appropriate.
- (7) Establish the charter for the VA Evidence Working Group.
- (8) Coordinate or commission Department-wide and cross-cutting program evaluations, systematic reviews, meta-analyses, or policy research to address VA Learning Agenda priority questions.

d. The VA Evidence Working Group shall:

(1) Be chaired by the EO (or designee) and facilitated by the Office of Enterprise Integration.

- (2) Have as members personnel with evidence and program evaluation responsibilities as well as representatives from the VA Strategic Planning Team, VA Data Governance Council and other such groups identified by the EO.
- (3) Report to the Evidence-Based Policy Council (EBPC) regularly to:
 - (a) Solicit priorities for key deliverables under Title I of the Evidence Act including the Learning Agenda and Annual Evaluation Plan,
 - (b) Share findings from significant evaluations to inform policy discussions in the EBPC, and
 - (c) Request assistance to resolve risks or obstacles that may be impeding the successful conduct of program evaluations included in the Annual Evaluation Plan.
- (4) Develop and propose new, or improvement of existing, processes to integrate evaluation findings into agency decision-making and other functions.
- (5) Assist VA leaders and organizations in developing meaningful relationships between budget requests and evidence using tools and checklists,
- (6) Review program evaluation and evidence-based efforts that relate to VA programs, resources, policies, and practices, recommending and monitoring improvements.
- (7) Serve as VA thought leaders for evidence-based policymaking and program evaluation, counseling VA senior leaders and organizations on effective principles, practices, and approaches.

4. REFERENCES.

- a. Public Law 115-435, 132 Stat. 5529, Foundations for Evidence-Based Policymaking Act of 2018 ("Evidence Act"),
- b. Office of Management and Budget (OMB) Memorandum M-19-15, Implementation of the Information Quality Act,
- c. Office of Management and Budget (OMB) Memorandum M-19-23, Phase 1, Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Learning Agendas, Personnel and Planning Guidance,
- d. Office of Management and Budget (OMB) Memorandum M-20-12, Phase 4 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Program Evaluation Standards and Practices,

e. Office of Management and Budget (OMB) <u>Memorandum M-21-27</u>, <u>Evidence-Based Policymaking: Learning Agendas and Annual Evaluation Plans</u>,

- f. Public Law 114-264, 130 Stat. 1371, Program Management Improvement Accountability Act of 2016 (PMIAA),
- g. Public Law 103-62, 107 Stat. 285, Government Performance and Results Act of 1993 (GPRA),
- h. Public Law 111-352, 124 Stat. 3866, Government Performance and Results Act Modernization Act of 2010 (GPRAMA),
- i. VA Directive 0900, VA Enterprise Data Management,
- j. Handbook 0009, Ensuring the Quality of Information Disseminated by VA, and
- k. Ethics Principles for Access to and Use of Veteran Data.

5. DEFINITIONS.

a. Evidence:

(1) OMB Memorandum M-21-27, "Evidence-Based Policymaking: Learning Agendas and Annual Evaluation Plans" states that evidence is viewed broadly as the available body of facts or information indicating whether a belief or proposition is true or valid. As such, evidence can be quantitative or qualitative and may come from a variety of sources, including foundational fact finding (e.g., aggregate indicators, exploratory studies, descriptive statistics, and other research), performance measurement, policy analysis, and program evaluation. Evidence has varying degrees of credibility, and the strongest evidence generally comes from a portfolio of high-quality, credible sources rather than a single source.

b. Program Evaluation:

- (1) The Evidence Act defines program evaluation as "an assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency." Program evaluations are crucial for learning and continuous improvement, as well as for transparency and accountability. Different types of evaluations are designed to address different questions, including:
 - (a) The context of a program, policy, or organization and how to address Veteran populations,
 - (b) The understanding of a target population or the finding of facts that may impact development of a program or policy and their associated processes,

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(c) The establishment of a program or policy and their associated processes and intended impacts and results,

- (d) The implementation of a program, policy, or organization and their associated processes,
- (e) The programmatic and cost effectiveness, impacts or outcomes of strategies and processes used by a program, policy, or organization,
- (f) Decisions regarding programming, policies, and operations,
- (g) Comparisons, including benchmarking, among policies, programs, and their associated processes, and
- (h) The effectiveness, efficacy, and alignment of programs to VA strategy.