



July 7, 2019

The Honorable Karen Dunn Kelley
Deputy Secretary
U.S. Department of Commerce
Washington, D.C. 20233

Re: Request for Input on the Draft Federal Data Strategy Action Plan

Dear Deputy Secretary Kelley and Priority Goal Leaders:

The American Evaluation Association is a professional association of evaluators devoted to the application and exploration of program evaluation, personnel evaluation, technology, and many other forms of evaluation. The American Evaluation Association has approximately 7,400 members representing all 50 states in the United States and the District of Columbia, as well as over 80 countries.

On behalf of the American Evaluation Association and its members, we are writing in general support of the Federal Data Strategy Action Plan. We appreciate the opportunity to provide feedback as requested in a Federal Register notice issued by the Department of Commerce (84 FR 25730).

We see the draft Federal Data Strategy Action Plan as consistent with our own efforts, as exemplified in *An Evaluation Roadmap for a More Effective Government* (2019). The *Roadmap* identifies approaches to: institutionalizing evaluation as an integral component of government program management; ensuring that evaluations provide the information needed to inform planning, budgeting, and ongoing program management; and ensuring that agencies have sufficient resources to support credible, systematic data collection and analysis.

The American Evaluation Association recommends a set of small but important additions to the actions proposed in the Federal Data Strategy Action Plan. These additions are intended to enhance the Action Plan's value in leveraging the value of data, by strengthening the connection between the Plan's activities and related actions to enhance agency capacity in evaluation and in new data collection efforts.

- **Proposed Addition 1:** Include the establishment of new evaluation officers and supporting evaluation policies as a priority action item in the year one plan. The Foundations for Evidence-Based Policymaking Act (P.L. 115-435, hereafter "Evidence Act") and the U.S. Commission on Evidence-Based Policymaking envisioned that the

evaluation function would become more established in government, as critical users of government data. Identifying that establishing these positions and policies in the near-term signals that one of the intended outcomes of the strategy is to ensure data are being used to better understand government policies and programs.

While the effective date for the Evidence Act is July 13, 2019 – the date on which agencies should have designated new evaluation officials – we recognize that establishing policies and practices within the evaluation units will take more time; prioritizing those activities over the next year is essential to the successful implementation of the Evidence Act.

- **Proposed Addition 2:** Expand the “Curated Data Science Training and Credentialing Catalog” (of the Action Plan’s Action 2) to include program evaluation as a possible career path. The Evidence Act directs consideration of the creation of an evaluation occupational series and career path for evaluation. Adding direction to begin this process through training in the Action Plan will support effective implementation of the Evidence Act.

We suggest an edit of the seventh line of the first full paragraph under Action 2: “their development goals, for positions including program evaluator, [insert others].” No changes should be needed in terms of responsible entities, metrics, or timelines. We further suggest expansion of the proposed catalog, echoing Action 14 language about the need for a workforce with skills including “data science, statistics, and program evaluation”, and argue for a curated catalog identifying training and credentialing opportunities in this broader set of skills. Notably, the American Evaluation Association recently issued a set of core competencies for professional evaluators that we hope will prove foundational for this work.

- **Proposed Addition 3:** Expand efforts to “Assess Data and Related Infrastructure Maturity” (Action Plan’s Action 13) to include forward-looking procedures for future assessment of new data collection, including those for evaluation purposes. One suggested edit would add “protocols for planning for future data collection,” after “on data” in the first line of the paragraph under Action 13. A second edit would add, after the item currently listed under Measurement for Action 13, “Use of protocol in new data collection for program evaluation and other purposes (Y/N)”

The American Evaluation Association appreciates the opportunity to provide suggestions to the Priority Goal Leaders regarding this important set of activities. We are available as a resource as the team moves forward with the Federal Data Strategy Action Plan and more generally with the task of leveraging data as a strategic asset for the federal government.

Re: AEA Response to Request for Input on the Draft Federal Data Strategy Action Plan

If we can be of assistance, or if you need more information about our organization, please do not hesitate to contact me (President2019@eval.org) or the American Evaluation Association's executive director, Anisha Lewis (alewis@eval.org) should you have further questions.

Sincerely,

Tessie Tzavaras Catsambas, MPP
President

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