

Comments on *The Promise of Evidence-Based Policymaking*

Kirk Wolter

FESAC

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Recommendations from the Commission on Evidence-Based Policymaking

Four major areas:

- Improving secure, private, and confidential data access
- Modernizing privacy protections for evidence building
- Implementing the national secure data service
- Strengthening federal evidence-building capacity

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Kudos

- Wonderful, well-conceived, and beautifully written report. Compliments to the commission and especially to Katharine. Coupled with emergent legislation, the report creates a foundation for better information and superior government policies.
- Report gives a very good treatment of the well-known tension between access to data and privacy of the persons and institutions supplying the data
- Yet in other respects, the report has gaps and I find the commissions recommendations are necessary but not sufficient

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Five General Comments

1. The production of evidence for policymaking is by its nature a political process. We can expect conflict (yet plan for collaboration) between political and evidence-based objectives at all stages.
 - What data are to be collected? How are the data to be analyzed and interpreted? How are press releases written and results described to the public?
 - There can be a difference between solutions driven by a manipulation intended to make some person or policy look good, and solutions based on scientific principles informed by relevant policy and business issues.

- How did the commission think about these issues?
- Except for the important principle of transparency, careful analysis of these issues is missing.
- In my mind, the need to balance political and evidence-based objectives further elevates the importance of independent, impartial, and credible statistical agencies and other evidence-producing institutions.

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2. What is the commission's view about nonresponse?
How will the changes proposed in the report influence decisions by people, corporations, and other entities to cooperate with government information collections?
3. For me, the report spends too little time discussing the evidence and the policymaking
 - > 80% devoted to mechanics of improving access, modernizing privacy protections, and implementing National Secure Data Service (NSDS)
 - < 20% devoted to analysis, delivery of information, and actual policymaking

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- I'd like to see much more on
 - How analysis will be conducted
 - By whom
 - Sources and amounts of funding
 - Recruiting and training of people with special skills
 - Delivery of results to policy makers in a form and on a schedule they can use
 - How the cycle of evidence and policymaking feeds back into what new data are to be collected, new analysis, and so forth

- CEBP's report focused attention mainly on access and privacy, which are incredibly important, yet is silent on so many other critical aspects of evidence-based policy making

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4. I suppose the premise of the CEBP report is that government is either not using information to formulate policies, or is not using information to its fullest potential. (This must vary from agency to agency, because I have worked with many agencies that do employ evidence in decision making.) Thus, the issue before the CEBP and before us today in this meeting is how to bring about cultural change within government so that empirical evidence can play an increasing role in policymaking.

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- In addition to the mechanics of access and privacy, the cultural change must begin by defining a set of values and behaviors. Cultural change must start with the behavior of leadership (agency, department, congress, White House) who must consistently model the use of evidence in policymaking
- To promote cultural change, leadership must communicate the vision to everyone, because the new culture of evidence-based policymaking will be a team effort

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- Align the vision with HR processes, such as
 - Hiring
 - Training
 - Performance management
 - Compensation
 - Reward system
 - Leadership
- Need to actively manage the cultural situation overtime, so there is an ongoing need to measure how the new vision is working

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- We must change values and behaviors, then actions to produce and use evidence in policymaking will follow
- In its further work, the commission and its successors would do well to get help from experts in cultural change

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5. CEBP's report is largely about the *supply* of evidence, but more attention is needed about the *demand* for evidence.
- Do policymakers want it?
 - Are they still interested in it?
 - Can it be injected into the policymaking process at the right time, at the right price, with the right quality, and without serious gaps?

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Six Specific Comments

1. Harmonize data definitions, otherwise definitional differences will plague linkages of different data sets
2. Disclosure Review Boards will play a pivotal roll in providing public-use data sets. NSDS may have the technical expertise to conduct disclosure reviews, but not be fully positioned to assess privacy. Need subject matter knowledge from the departments and agencies to understand what external threats are possible and realistic.
3. NSDS should be a service, not a warehouse
 - How to address needs for research, which may be iterative?
 - To make the iterative process efficient, there should not be a requirement for a full new request each time

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5. Is Chief Evaluation Officer the right approach?

- What alternatives were considered?
- Assigning “evidence” to a new executive could result in evidence that is isolated and ignored
- Did the commission consider building “evidence” into the values and behavior of the whole leadership team?

6. Is NSDS the right approach?

- Did the commission consider folding this function into an existing agency?
- There must be a big overhead cost to standing up a new agency

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Summation

- Wonderful report
- Wonderful start
- Important work ahead
- I look forward to hearing about next steps.