



June 27, 2021

Electronically submitted to equityRFI@omb.eop.gov and [Regulations.gov](https://www.regulations.gov)

The Honorable Shalanda Young
Acting Director
Office of Management and Budget
Executive Office of the President
Washington, D.C. 20503

Re: OMB Request for Information on Advancing Equity and Support for Underserved Communities Through Government (86 FR 24029)

Dear Acting Director Young:

On behalf of the American Evaluation Association (AEA), we applaud the President's stated focus on addressing societal inequities that adversely impact communities and populations across the country, and we further applaud his intention to apply evidence-based practices to this effort.¹ We also appreciate the opportunity to provide comments in response to the White House Office of Management and Budget's (OMB) request for public feedback on methods and leading practices for addressing equity and support for underserved communities in the United States (*Federal Register*, 86(85): 24029).

AEA is a professional association of evaluators. AEA's mission is to improve evaluation practices and methods worldwide, to increase evaluation use, promote evaluation as a profession and support the contribution of evaluation to the generation of theory and knowledge about effective human action.

Evaluation involves assessing the strengths and weaknesses of programs, policies, personnel, products and organizations to improve their effectiveness. As we suggest in AEA's *Evaluation Roadmap for a More Effective Government*, evaluation can address contextual appropriateness, providing evidence that can help ensure equitable resource allocation, policy development, and implementation practices, as well as encourage the appropriateness of programs across diverse settings and communities.² Our comments on OMB's RFI provide additional perspective related

¹ AEA. Statement on President Biden's Prioritization of Evidence-Based Policymaking and Evaluation. Washington, D.C. AEA, 2021. Available at: <https://www.eval.org/Portals/0/Final%20Scientific%20Integrity%20Statement%203-22-2021.pdf>

² AEA. *An Evaluation Roadmap for a More Effective Government*. Washington, D.C.: AEA, 2019. Available at: <https://www.eval.org/Portals/0/Docs/AEA%20Evaluation%20Roadmap%202019%20Update%20FINAL.pdf>

to this point and build on a recent policy statement from the AEA Board of Directors about the role of evaluation and evaluators in addressing inequalities in society.³

In response to the broad questions raised by OMB in the RFI, AEA encourages the following:

1. **Area 1: Equity Assessments -- Agencies should evaluate existing DEI and stakeholder engagement processes.** Federal agencies currently implement practices for engaging underserved communities in assessment, planning, implementation, and governance to increase access and decrease disparities or disproportionalities for policy and program implementation. Formal evaluation methods and approaches that disaggregate relevant data and analytics should be considered among the menu of approaches for agencies to assess the implementation and consequences of past as well as ongoing programs, activities, and engagements. Equity Action Plans should specify indicators and processes for monitoring and evaluating agency progress toward equity goals. The insights from these evaluations should be employed in the formulation of subsequent agency Equity Action Plans.
2. **Area 5: Stakeholder Engagement – Agencies should adopt active engagement processes to effectively implement Equity Action Plans and evaluate outcomes.** Active engagement can be achieved using well-established approaches such as culturally-responsive evaluation, participatory evaluation, and equity-focused evaluation, which benefit from stakeholder partnerships and rich context. To address common barriers to equitable participation in programs and agencies as well as in evaluations, such processes should include (1) strategies to include populations and communities in all phases of evaluation from the design stage to ultimately using results; (2) refinement of research questions to reflect community perspectives; and (3) sufficient advance notice, information, and resources about evaluations for stakeholders. These planning features for stakeholder engagement can help address barriers in affected communities, such as access to technology, arrangements with employers and child care providers, and other communication-related topics. Collaboration with multiple stakeholders on the evaluation is generally advisable to ensure that the process is useful and that the results are used. However, the agency’s evaluation officials should retain responsibility for the evaluation’s design, methods, and results to ensure evaluation rigor and independence. Evaluation officials can also promote accountability and adoption of ethical procedures within scientific integrity protocols for reaching underserved communities. Additional resources about culturally-responsive, contextually-responsible, evaluation and equity-focused evaluation are available, including material and roadmaps from the American Evaluation Association.⁴
3. **General Comment – Evaluation, like efforts to advance equity, should be interwoven across the initiative’s activities to enhance learning, improvement, and effectiveness.**

³ AEA. Statement from the AEA Board of Directors Regarding Racism and Inequality in our Society. Washington, D.C.: AEA, 2021. Available at: <https://www.eval.org/Full-Article/statement-from-the-aea-board-of-directors-regarding-racism-and-inequality-in-our-society>

⁴ For example, AEA. Guiding Principles for Evaluators. Washington, D.C.: AEA, 2018. Available at: <https://www.eval.org/About/Guiding-Principles>

Without intentional and ongoing attention, both evaluation and efforts to advance equity can become one-off endeavors. Instead, both should be integrated into organizational routines. In particular, any initiative to advance equity and support underserved populations should include a program of ongoing evaluation. If well designed and appropriately resourced, such evaluation can serve several purposes, including guidance for management, learning for broader application, accountability to current and intended beneficiaries of the initiative, and measuring and tracking progress towards improving equity.

The American Evaluation Association appreciates the opportunity to provide suggestions to OMB as it undertakes this important set of activities. We look forward to being a resource for OMB staff, the Domestic Policy Council, and agencies as the Executive Branch undertakes the task of implementing the President's Executive Orders and developing Equity Action Plans over the next year.

If we can be of further assistance, please do not hesitate to contact me (President2021@eval.org) or AEA's Executive Director Anisha Lewis (alewis@eval.org).

Sincerely,

Tom Grayson, Ph.D.
President
American Evaluation Association