



February 17, 2023

Transmitted Electronically

RE: Centers for Disease Control Proposed Update to the Framework for Program Evaluation in Public Health (Docket No. CDC-2022-0137)

Dear Dr. Daniel Kidder:

On behalf of the American Evaluation Association, we appreciate the opportunity to comment on the Centers for Disease Control and Prevention's Program Evaluation Framework and to respond to the request for information on how the Framework supports high-quality program evaluations, in which contexts it has been most helpful, and whether it supports culturally-responsive evaluations. The American Evaluation Association is a professional association of evaluators, with the mission of improving evaluation practices and methods, increasing evaluation use, promoting evaluation as a profession, and supporting the contribution of evaluation to the generation of theory and knowledge about effective human and government action.

The American Evaluation Association strongly supports the CDC's efforts over time to promote high-quality evaluation in public health as well as its commitment to ensure that its guidance most appropriately reflects the program evaluation field. On behalf of our members, I applaud the wide-reaching and long-lasting impact the CDC Evaluation Framework brought to program evaluation in the federal government since it was developed. The Framework has guided evaluations in public health as well as across policy areas for over two decades, and remains a useful tool today.

The Framework is largely in line with current evaluation theory and practice. As the CDC revises the Framework, the American Evaluation Association encourages the CDC to emphasize equity to best reflect the crucial role that evaluation plays in providing evidence that can help ensure equitable practices and allocation of resources as well as appropriateness of programs across diverse settings. Evaluation can address cultural appropriateness, and all evaluation methods should be context-sensitive and have cultural relevance. Five resources that the American Evaluation Association published in recent years may be helpful to provide insight for the CDC as it updates its Framework to address health equity:

- [Statement](#) on Cultural Competencies (April 2011)
- AEA's Evaluator [Competencies](#) (May 2018)
- The Evaluation Policy Task Force's [Evaluation Roadmap for a More Effective Government](#) (September 2019)
- [Response](#) to the Office of Management and Budget's Request for Information on Advancing Equity and Support for Underserved Communities Through Government (May 2021)
- [Statement](#) in Support of the White House Commitment to Include Indigenous Traditional Ecological Knowledge in Federal Policymaking (February 2022)

Our members have produced valuable resources – as do others across the broader evaluation community – for supporting equitable evaluation that we encourage the CDC to explore.

Further, the American Evaluation Association recommends the CDC prioritize equity in its own processes as it continues to develop the framework and plan for culturally-responsive evaluations in the future. The CDC can demonstrate its commitment to equitable evaluation by ensuring there are resources to build capacity for addressing systemic inequalities that impact evaluation. For example, CDC can allocate resources and create incentives for culturally-responsive evaluations. Building on recent White House guidance, perspectives from Tribal Nations and Indigenous communities should also be visible in the CDC's work, and the CDC can ensure Tribal Nation leaders and Indigenous scholars have representation on high-level evaluation advisory groups and Indigenous theories, methods, and frameworks are integrated into the evaluation framework and practice.

The American Evaluation Association appreciates the opportunity to provide comments and welcomes the opportunity to be a resource as the CDC updates the Framework. If our members can be of further assistance, please contact me (president@eval.org) or AEA's Executive Director Anisha Lewis (alewis@eval.org).

Sincerely,

Corrie Whitmore
President
American Evaluation Association