



Administration for Community Living Evaluation Policy Updated 2021

Introduction

This evaluation policy builds on the Administration for Community Living's practice of conducting program evaluation according to widely recognized standards of the American Evaluation Association¹ and as defined by the Office of Management and Budget². This policy reflects the requirements of the Foundations for Evidence-based Policy-making Act of 2018 as well as the standards provided in OMB Memorandum M-20-12³. This policy reconfirms ACL's commitment to conducting rigorous, relevant evaluations and to using evidence from evaluations to inform policy and practice. It indicates ACL's interest in conducting outcome focused evaluations for all ACL programs.

¹ Information about the American Evaluation Association evaluation standards are available at: Yarbrough, D. B., Shulha, L. M., Hopson, R. K., and Caruthers, F. A. (2011). *The program evaluation standards: A guide for evaluators and evaluation users* (3rd ed.). Thousand Oaks, CA: Sage **and** [The program evaluation standards: A guide for evaluators and evaluation users \(3rd ed.\)](#).

² Selected OMB program evaluation guidance is available at: [OMB webpage titled "Evidence and Evaluation"](#)

³ Downloaded 8/12/2021 [M-20-12 Phase 4 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Program Evaluation Standards and Practices](#)

ACL seeks to promote rigor, relevance, transparency, independence, and ethics in the conduct of evaluations.

The Administration for Community Living (ACL) is committed to the principle that "All people, regardless of age or disability, should be able to live independently and participate fully in their communities. Every person should have the right to make choices and to control the decisions in and about their lives. This right to self-determination includes decisions about their homes and work, as well as all the other daily choices most adults make without a second thought".⁴ To achieve this, ACL "provides national leadership and direction to plan, manage, develop, and raise awareness of comprehensive and coordinated systems of long-term services and supports that enable older Americans and individuals with disabilities, including intellectual, developmental, physical, and other disabilities, to maintain their health and independence in their homes and communities. ACL programs support strong state, tribal, and local community networks designed to respond to the needs of persons with disabilities, older adults, and their families through advocacy, research, systems change and capacity building to ensure access to needed community services, individualized supports, and other forms of assistance that promote self-determination, independence, productivity, and integration and inclusion in all facets of

⁴ Downloaded [About Community Living](#) on 7/2/2018

community life.”⁵ The importance of this commitment demands continual innovation and improvement, and that we systematically evaluate our activities and those of our partners. Through evaluation, ACL and our partners can learn systematically so that we can make our services as effective as possible. Evaluation produces one type of evidence. ACL recognizes that a learning organization with a culture of continual improvement requires many types of evidence, including not only evaluation but also descriptive research studies, performance measures, financial and cost data, survey statistics, and program administrative data⁶. Further, continual improvement requires systematic approaches to using information, such as regular data-driven reviews of performance and progress. Although this policy focuses on evaluation, the principles and many of the specifics apply to the development and use of other types of evidence as well. This policy applies to all ACL-sponsored evaluations. While much of ACL’s evaluation activity is overseen by the Office of Planning and Evaluation (OPE), ACL program offices also sponsor evaluations through dedicated contracts or as part of their grant-making process. In order to promote quality, coordination and usefulness in _____

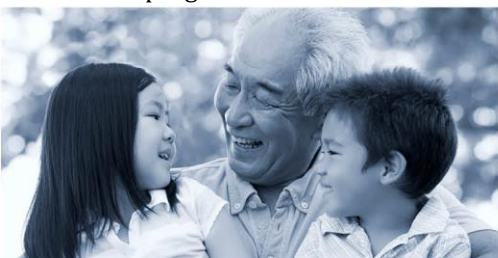
⁵ Downloaded from the Federal Register at [Statement of Organization, Functions, and Delegations of Authority; Administration for Community Living](#) on 1/15/2017

⁶ PROGRAM EVALUATION: Strategies to Facilitate Agencies’ Use of Evaluation in Program Management and Policy Making (GAO-13-570)Downloaded 6-1-2018 Strong evidence may include descriptive research, clinical trials, evaluations of innovative practices, survey statistics, performance data, case studies, and program administrative data.

ACL’s evaluation activities, OPE provides consultations and support to ACL program offices when designing evaluation activities and evaluation language for relevant documents such as notice of funding opportunity announcements (NOFO’s). Program offices are encouraged to discuss evaluation projects with OPE in early stages to clarify evaluation questions and assess methodological options. As activities progress, OPE staff will be available to review evaluation designs, plans, and reports. Program offices may also ask OPE to design and oversee evaluation projects on their behalf or in collaboration with program office staff.

Rigor

Credible evaluations must be managed by qualified evaluators with relevant education, skills, and experience for the methods undertaken. An evaluation must have the most appropriate design and methods to answer key questions, while balancing its goals, scale, timeline, feasibility, and available resources. ACL is committed to using the most rigorous methods that are appropriate to the evaluation questions and feasible within budget and other constraints. Rigor is not restricted to impact evaluations, but is also necessary in implementation or process evaluations, outcome evaluations, and formative evaluations; and in both qualitative and quantitative approaches. Rigor requires ensuring that inferences about cause and effect are well founded (internal validity); requires clarity about the populations, settings, or circumstances to which results can be generalized (external validity); and requires the use of



measures that accurately capture the intended information (measurement reliability and validity).

In assessing the effects of programs or services, ACL evaluations will use methods that isolate to the greatest extent possible the impacts of the programs or services from other influences such as trends over time, geographic variation, or pre-existing differences between participants and non-participants. For such causal questions, experimental approaches are preferred. When experimental approaches are not feasible, high-quality quasi-experiments offer an alternative.

Staffing

ACL will recruit and maintain an evaluation workforce with training and experience appropriate for planning and overseeing a rigorous evaluation portfolio throughout ACL. To accomplish this, ACL will recruit staff with advanced degrees and experience in a range of relevant disciplines such as program evaluation, policy analysis, economics, demography, anthropology, sociology, gerontology, disability studies, and public health. ACL will provide professional development opportunities so that staff can keep their skills current. ACL will ensure that contractors and grantees conducting evaluations have appropriate expertise through emphasizing the capacity for rigor in requests for proposals and funding opportunity announcements. This emphasis entails specifying expectations in criteria for the selection of grantees and contractors, and engaging reviewers with evaluation expertise. It also requires allocating sufficient resources for evaluation

activities. ACL will generally require evaluation contractors to consult with external advisors who are leaders in relevant fields through, for example, the formation of technical work groups.

Relevance and Utility

Evaluation priorities should take into account legislative requirements and Congressional interests and should reflect the interests and needs of ACL, HHS, and Administration leadership; program office staff and leadership; ACL partners including Federal partners, states, territories, tribes, and local grantees; the populations served; researchers; and other stakeholders. Evaluations should be designed to represent the diverse populations that ACL programs serve, and ACL should encourage diversity among those carrying out the work, through building awareness of opportunities and building evaluation capacity among under-represented groups.

There must be strong partnerships among evaluation staff, program staff, policy-makers and service providers. Policy-makers and practitioners should have the opportunity to influence evaluation priorities to meet their interests and needs. Further, for new initiatives and demonstrations in particular, evaluations will be more feasible and useful when planned in concert with the planning of the initiative or demonstration, rather than as an afterthought. Given federal requirements related to procurement and information collection, it can take many months to award a grant or contract and begin collecting data. Thus, it is critical that planning for research, evaluation, and dissemination of evaluation products be



integrated with planning for new initiatives.

Evaluations should present findings that are actionable and available in time for use. Information should be presented in ways that are understandable and that can inform agency activities and actions such as budgeting, program improvement, accountability, management, regulatory action, and policy development. OPE and program offices will work in partnership to inform potential applicants, program providers, administrators, policy-makers and funders through disseminating evidence from ACL-sponsored and other good quality evaluations.

It is ACL's policy to integrate both use of existing evidence and opportunities for further learning into all of our activities. Where an evidence base is lacking, we will build evidence through strong evaluations. Where evidence exists, we will use it.

Discretionary notices of funding opportunity will require that successful applicants cooperate with any federal evaluations if selected to participate. As legally allowed, programs with waiver authorities should require rigorous evaluations as a condition of waivers. As appropriate, ACL will encourage, incentivize, or require grantees to use existing evidence of effective strategies in designing or selecting service approaches. The emphasis on evidence is meant to support, not inhibit, innovation, improvement, and learning.

Transparency

ACL will make information about planned and ongoing evaluations easily accessible, typically through posting on the ACL website

information about the contractor or grantee conducting the work and descriptions of the evaluation questions, methods to be used, and expected timeline for reporting results. ACL will present information about evaluation designs, implementation, and findings at professional conferences and ad hoc meetings

Evaluation plans will be published in advance. ACL will release evaluation results regardless of the findings. Evaluation reports will describe the methods used, including strengths and weaknesses, and discuss the generalizability of the findings. Evaluation reports will present comprehensive results, including favorable, unfavorable, and null findings. Once evaluations are complete, ACL will make public comprehensive reporting of the findings in a timely manner and with sufficient detail so that others can review, interpret, or replicate/reproduce the work. ACL will archive evaluation data for secondary use by interested researchers, typically through building requirements into contracts to prepare data sets for secondary use.

Independence and Objectivity

Independence and objectivity are core principles of evaluation. Agency and program leadership, program staff, service providers and others should participate actively in setting evaluation priorities, identifying evaluation questions, and assessing the implications of findings. However, it is important to insulate evaluation functions from undue influence and from both the appearance and the reality of bias. To promote objectivity, ACL



protects independence in the design, conduct and analysis of evaluations. To this end:

- ACL will conduct evaluations through the competitive award of grants and contracts to external experts who are free from conflicts of interest.
- The director of the Office of Planning and Evaluation has authority to approve: 1) the design of evaluation projects and analysis plans and 2) the release and dissemination of evaluation reports
- ACL evaluation staff strive for objectivity in the planning and conduct of evaluations and in the interpretation and dissemination of findings, avoiding conflicts of interest, bias, and other partiality

Ethics and Equity

ACL-sponsored evaluations will be planned and implemented to safeguard the dignity, rights, safety, and privacy of participants

and other stakeholders and affected entities. Evaluation participants will always be able to verify the validity of an evaluation by having direct access to an ACL staff member. Evaluators should abide by current professional standards pertaining to treatment of participants. Evaluations should be equitable, fair, and just, and should take into account cultural and contextual factors that could influence the findings or their use. ACL will use culturally responsive practices, sustained and intentional community/stakeholder engagement, and include systemic and/or structural analyses. ACL-sponsored evaluations will comply with both the spirit and the letter of relevant requirements such as regulations governing research involving human subjects.

For more information about ACL

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