



August 2024

EVIDENCE-BASED POLICYMAKING

Agencies Need Additional Guidance to Assess Their Capacity

GAO Highlights

Highlights of [GAO-24-106982](#), a report to congressional committees

Why GAO Did This Study

Federal decision-makers need evidence about whether federal programs and activities are achieving intended results. The Evidence Act aims to enhance federal agencies' capacity to build and use evidence.

The Evidence Act includes provisions for GAO to report on findings and trends in agencies' capacity assessments. This report describes (1) common themes in agencies' capacity assessments, and (2) benefits and challenges related to conducting capacity assessments identified by agency officials.

To address these objectives, GAO conducted a content analysis of 23 agencies' capacity assessments. GAO also interviewed OMB and Evaluation Officer Council staff as well as officials at the 24 agencies directed by OMB to conduct capacity assessments—those covered by the Chief Financial Officers Act of 1990.

What GAO Recommends

GAO recommends that OMB should leverage the Evaluation Officer Council to (1) identify agency officials' needs for additional guidance on capacity assessments and address them accordingly and (2) identify, document, and share lessons learned on capacity assessment methods. OMB neither agreed nor disagreed with the recommendations and stated that it would take them into consideration moving forward. The Departments of Agriculture and the Treasury, Nuclear Regulatory Commission, Social Security Administration, and U.S. Agency for International Development also provided comments. The remaining agencies did not comment.

View [GAO-24-106982](#). For more information, contact Dawn Locke at (202) 512-6806 or locked@gao.gov.

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Agencies Need Additional Guidance to Assess Their Capacity

What GAO Found

The Foundations for Evidence-Based Policymaking Act of 2018 (Evidence Act) requires agencies, every 4 years, to assess aspects of their statistics, evaluation, research, and analysis efforts by addressing five topics, such as quality and methods. Agencies published capacity assessments for the first time in 2022.

GAO identified 12 themes related to six topics across agencies' assessments.

Topics	Themes
	Agencies identified:
Capacity	1. Strengths to build one or more source of evidence, including having staff and tools to undertake various evidence-building activities 2. Opportunities to enhance capacity, including hiring new staff and training existing staff
Coverage	3. Their organizational approach (e.g., centralized vs. dispersed) to evidence-building 4. The programs, operations, and activities covered by their evidence-building activities
Quality	5. Strengths to ensure evidence quality by following policies and guidance and leveraging expertise 6. Opportunities to enhance the quality of evidence, including by standardizing evidence-building approaches and tools
Methods	7. Strengths to ensure methods were rigorous and appropriate by following policies and guidance and leveraging expertise 8. Opportunities to enhance capacity for and the implementation of certain methodologies
Effectiveness	9. Strengths to ensure evidence was useful and used, including by incorporating it into existing decision-making processes 10. Opportunities to enhance use by prioritizing new evidence to meet needs and better disseminating evidence
Independence	11. Strengths for ensuring independence, including by following relevant policies, guidance, and leading practices 12. Opportunities to enhance independence by revising evidence-building policies, practices, and organizational structures

Source: GAO analysis of agency capacity assessments. | GAO-24-106982

Agency officials identified common benefits and challenges related to developing capacity assessments. Officials expect some challenges will not persist. For example, officials stated it was challenging to identify all evidence-building activities because they are dispersed around their agencies, but they have now developed a better understanding of where those activities occurred.

Agency officials also identified unresolved challenges:

- **Guidance.** Agency officials said they faced challenges understanding Office of Management and Budget (OMB) guidance and how the assessments would be used. GAO found variation in what agencies assessed and how they presented their findings. Additional guidance could help agencies provide more comparable information in future iterations. This could also help decision-makers identify and address common issues across agencies.
- **Methods.** Agency officials said it was a challenge to identify appropriate approaches for conducting the assessment. They used different methodologies to assess their evidence-building capacity, which sometimes did not result in useful information. Identifying, documenting, and sharing lessons learned could help agencies select appropriate methodologies to ensure future capacity assessments consistently provide useful information.

The interagency Evaluation Officer Council, chaired by OMB, has responsibilities for sharing information and helping agencies with Evidence Act implementation.

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Abbreviations

CFO	Chief Financial Officer
DOD	Department of Defense
Evidence Act	Foundations for Evidence-Based Policymaking Act of 2018
GSA	General Services Administration
OMB	Office of Management and Budget
OPM	Office of Personnel Management

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August 20, 2024

Congressional Committees

Federal decision-makers need evidence about whether federal programs and activities are achieving intended results. Evidence can include performance information, program evaluations, statistical data, and other research and analysis. Congressional and executive branch leaders can use evidence to determine how federal programs and activities could best make progress toward national objectives, such as expanding the use of renewable energy, enhancing national security, or improving veterans' health care. Evidence can also help leaders better understand and address challenges and set priorities to improve program implementation and performance.

To ensure that decision-makers and stakeholders have the evidence they need, federal agencies undertake a range of evidence-building activities. Our recent work has found that federal agencies have made some progress in effectively building and using evidence.¹ However we also continue to find that agencies face challenges. For example, in July 2021, we found that the capacity for evidence building varied widely across agencies.² Having sufficient capacity is critical to federal agencies' efforts to collect the needed information to improve performance.³

The Foundations for Evidence-Based Policymaking Act of 2018 (Evidence Act), enacted in January 2019, aims to enhance federal agencies' capacity to build and use evidence.⁴ For example, the Evidence Act requires agencies to periodically assess various aspects of their evidence-building activities and capacity (also referred to as capacity

¹See, for example, GAO, *Chief Data Officer Council: Progress in Strengthening Federal Evidence-Based Policymaking*, [GAO-23-105514](#) (Washington, D.C.: Dec. 15, 2022), and *Evidence-Based Policymaking: Survey Results Suggest Increased Use of Performance Information across the Federal Government*, [GAO-22-103910](#) (Washington, D.C.: Nov. 3, 2021).

²GAO, *Evidence-Based Policymaking: Survey Data Identify Opportunities to Strengthen Capacity across Federal Agencies*, [GAO-21-536](#) (Washington, D.C.: July 27, 2021).

³GAO, *Evidence-Based Policymaking: Practices to Help Manage and Assess the Results of Federal Efforts*, [GAO-23-105460](#) (Washington, D.C.: July 12, 2023).

⁴Pub. L. No. 115-435, 132 Stat. 5529 (2019).

assessments).⁵ Agencies published their first capacity assessments in 2022.

The Evidence Act includes provisions for us to report on findings and trends in agencies' capacity assessments.⁶ This report describes (1) common themes in agencies' capacity assessments and (2) benefits and challenges related to conducting capacity assessments identified by agency officials.

To identify themes across assessments, we conducted a structured content analysis of the capacity assessments issued by 23 agencies.⁷ We reviewed the capacity assessments published in 2022—the first and only ones required at the time of our review by the Evidence Act.⁸ Prior to beginning the content analysis, we developed a coding scheme using capacity assessment content requirements, key words (e.g., program evaluation, staffing), and type of finding (e.g., strengths, actions taken). Assessments were coded by a primary analyst and then codes were reviewed by a second analyst. Analysts reached consensus on codes through discussion.

⁵Pub. L. No. 115-435, § 101(c)(3), 132 Stat. at 5533, *codified at* 5 U.S.C. § 306(a)(9).

⁶Pub. L. No. 115-435, § 101(d), 132 Stat. at 5533, *codified at* 5 U.S.C. § 306 note. The Evidence Act also directs us to recommend actions to further improve agency capacity to use evaluation techniques and data to support evaluation efforts, if appropriate.

⁷Office of Management and Budget guidance directs 24 major agencies to develop these assessments. Circular No. A-11, § 290.1 (August 2023). As of May 2024, one of those agencies—the Department of Defense (DOD)—had not published its capacity assessment. In January 2024, DOD officials told us that organizational changes between 2021 and 2023—including the dissolution of a DOD office—hindered the department's ability to conduct the assessment. In May 2024, DOD officials provided us with information describing their plans to develop and publish a capacity assessment by February 2026, when the next required iteration is due. It will be important for DOD to conduct and publish this assessment, to more fully understand and identify opportunities to enhance the department's capacity to build and maintain evidence. We will continue to monitor DOD's progress in this area.

⁸The Evidence Act requires agencies to develop these assessments every 4 years, as part of their strategic plans. Pub. L. No. 115-435, § 101(c)(3), 132 Stat. at 5533, *codified at* 5 U.S.C. § 306(a)(9). Office of Management and Budget guidance encourages agencies to update their capacity assessments more frequently, as appropriate, given their context and needs. Circular No. A-11, § 290.13 (August 2023). As of May 2024, two agencies—the Department of Health and Human Services and Nuclear Regulatory Commission—had published capacity assessment updates. We excluded those updates from our analysis to maintain comparability across agencies.

We then queried and analyzed the results, using professional judgment to identify common themes. Our coding scheme captured findings in six broad topics. Within each topic, we determined when multiple agencies identified the same or similar findings (sub-themes).⁹ We also identified that many of those sub-themes shared commonalities (e.g., each related to a strength) and could be further grouped together as a theme (e.g., strengths).¹⁰

To illustrate each theme, we selected an example from an agency's capacity assessment. Because the assessments were published in 2022, we sought updates from agency officials when examples described planned actions to address a finding. We also identified examples of government-wide actions that relate to selected themes.

To identify benefits and challenges related to developing capacity assessments, we held semi-structured interviews with relevant officials at the 24 major federal agencies directed to develop them.¹¹ The officials included agency Evaluation Officers, Chief Data Officers, and Statistical Officials. We analyzed the information collected by these interviews to identify insights that were common across multiple agencies. We also interviewed staff from the Office of Management and Budget (OMB) who (1) were involved in providing guidance and technical assistance to agency officials, and (2) lead and support the work of the interagency Evaluation Officer Council, which OMB chairs.

We conducted this performance audit from August 2023 to August 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that

⁹Each sub-theme involved at least three agencies. We did not corroborate or verify the accuracy of agencies' capacity assessment findings.

¹⁰Each theme involved at least six agencies, or about one-quarter of the agencies.

¹¹The 24 agencies are those identified in the Chief Financial Officers (CFO) Act of 1990, as amended, which are generally the largest federal agencies. 31 U.S.C. § 901(b). The 24 CFO Act agencies are the U.S. Departments of Agriculture, Commerce, Defense, Education, Energy, Health and Human Services, Homeland Security, Housing and Urban Development, the Interior, Justice, Labor, State, Transportation, the Treasury, and Veterans Affairs, as well as the U.S. Agency for International Development, Environmental Protection Agency, General Services Administration, National Aeronautics and Space Administration, National Science Foundation, Nuclear Regulatory Commission, Office of Personnel Management, Small Business Administration, and Social Security Administration.

the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Federal Evidence-Building Efforts

OMB defines evidence as “the available body of facts or information indicating whether a belief or proposition is true or valid.”¹² According to OMB guidance, evidence can consist of quantitative or qualitative information and may be derived from a variety of sources, including performance measurement; program evaluations; foundational fact finding; policy analysis; and other data, research, and analysis.¹³ OMB recommends that agencies build a portfolio of high-quality, credible sources of evidence—rather than a single source—to support decision-making.

According to OMB guidance, agencies need “to significantly rethink how they currently plan and organize evidence-building, data management, and data access functions to ensure an integrated and direct connection to data and evidence needs” as envisioned by the Evidence Act.¹⁴ As we have previously reported, agencies can only fully realize the benefit of building a portfolio of evidence when decision-makers and stakeholders use it to identify and correct problems, improve program implementation, and make other important management and resource allocation decisions.¹⁵

¹²Office of Management and Budget (OMB), Circular No. A-11, § 200.24 (August 2023). The Evidence Act adopts as its definition of evidence “information produced as a result of statistical activities conducted for a statistical purpose.” It adopts as its definition of statistical purpose “the description, estimation, or analysis of the characteristics of groups, without identifying the individuals or organizations that comprise such groups and includes the development, implementation, or maintenance of methods, technical or administrative procedures, or information resources that support” those actions. Pub. L. No. 115-435, § 101(a)(1), 132 Stat. at 5530; 44 U.S.C. § 3561(6), (12). OMB’s Circular No. A-11 contains these definitions. However, the guidance also states that in the context of improving organizational and agency performance, “evidence” can be viewed more broadly, in line with OMB’s definition. Although OMB updated it in July 2024, we cite the 2023 version throughout this report because it was the most recent during the majority of the time of our review.

¹³OMB, Circular No. A-11, § 200.24 (August 2023), and Memorandum M-19-23 (2019).

¹⁴OMB, Memorandum M-19-23 (2019).

¹⁵[GAO-23-105460](#).

Our recent work has found that federal agencies have made some progress in effectively building and using evidence.¹⁶ For example, in November 2021, we found that the reported use of performance information in decision-making increased in 2020, both across the federal government and at a majority of agencies.¹⁷ However, we continue to find that agencies face challenges ensuring they have the evidence they need to inform decision-making. Agencies also face challenges ensuring evidence is of sufficient quality.

The federal government has made significant investments to ensure it has capacity—such as having staff with relevant skills and tools—to build and use different sources of evidence. For example, OMB recognizes 16 agencies and units whose activities are predominantly the collection, compilation, processing, or analysis of information for statistical purposes.¹⁸ These agencies help provide the capacity to develop and use statistical data as evidence. According to the President’s Budget for Fiscal Year 2025, those 16 agencies and units received approximately \$3.7 billion in appropriations in fiscal year 2023.¹⁹

Despite these investments in recognized statistical agencies and units, agencies continue to face challenges building and maintaining sufficient capacity for statistics, evaluation, research, and analysis more broadly. In July 2021, we analyzed results from a survey of federal managers which we conducted in 2020.²⁰ The results showed that about one-third to one-half of managers reported that different aspects of capacity (e.g., having staff with relevant skills) were present in their agencies. When we disaggregated results, we found that reported capacity varied widely across agencies and sources of evidence. We recommended that OMB should work with relevant partners to leverage our survey results to inform efforts to enhance federal evidence-building capacity.

¹⁶See, for example, [GAO-23-105514](#), [GAO-22-103910](#).

¹⁷[GAO-22-103910](#).

¹⁸According to OMB, although those 16 agencies and units are primarily focused on statistics, the federal government has over 100 agencies, units, and programs that conduct statistical activities. OMB, *Analytical Perspectives, Budget of the U.S. Government, Fiscal Year 2025* (2024).

¹⁹OMB, *Analytical Perspectives, Budget of the U.S. Government, Fiscal Year 2025* (2024).

²⁰[GAO-21-536](#).

Subsequently, OMB and agencies have taken actions to address this recommendation, which we closed as implemented in April 2024.²¹

Evidence-Building Roles and Responsibilities

The following officer positions, agencies, and councils have responsibilities for building and using evidence, and enhancing related capacity.

Agency officer positions. The Evidence Act established several senior officer positions with responsibilities related to enhancing their agency's capacity to build or use certain sources of evidence: Evaluation Officers (program evaluation), Statistical Officials (statistical data), and Chief Data Officers (data).²² For example, the Evidence Act requires the Evaluation Officer to assess their agency's capacity to support evaluation and to coordinate, develop, and implement their agency's evidence-building plans.²³

Interagency councils. Agency officials are involved in several interagency councils that were established by law and OMB to improve information sharing and coordination: the Evaluation Officer Council, Interagency Council on Statistical Policy, and Chief Data Officer Council.²⁴ According to statutory provisions or OMB direction, these councils are responsible for, among other things, assisting OMB with identifying and sharing insights into effective ways that agencies can improve federal evidence building. These councils also identify and share best practices through written resources and training sessions.

OMB. OMB has broad responsibilities for overseeing federal evidence-building activities. For example, OMB played a primary role in supporting

²¹In December 2023, OMB staff told us that the survey results had been discussed at relevant interagency council meetings in 2021. According to OMB staff, those discussions and other sources of evidence informed subsequent OMB actions aimed at enhancing federal capacity. Moreover, several agencies leveraged our survey results when conducting their capacity assessments.

²²The Evidence Act requires the 24 Chief Financial Officer Act agencies to establish these three officer positions. Pub. L. No. 115-435, §§ 101(a)(1), 202(e)(1), 132 Stat. at 5531, 5541, *codified at* 5 U.S.C. §§ 313, 314; 44 U.S.C. § 3520. Additional agencies are required to establish a Chief Data Officer position. For more information, see [GAO-23-105514](#).

²³Pub. L. No. 115-435, § 101(a)(1), 132 Stat. at 5531, *codified at* 5 U.S.C. § 313(d)(2), (4).

²⁴OMB officials serve as the Chair of the Evaluation Officer Council and Interagency Council on Statistical Policy, and on the Executive Committee of the Chief Data Officer Council.

agencies' efforts to assess and enhance their capacities as part of Evidence Act implementation.²⁵ According to its guidance, OMB provides assistance, direction, and support to agencies as they assess their evidence-building capacity and develop plans for future activities.²⁶ Given its broad purview across the entire executive branch, OMB also plays a key role in coordinating cross-cutting efforts, including those related to evidence building. For example, OMB officials and staff generally direct or participate in the activities of relevant interagency councils.²⁷

Office of Personnel Management (OPM). OPM has broad responsibilities for strategic human capital management across the federal government.²⁸ These responsibilities include supporting and assessing agencies' management of human capital, including efforts to identify and close skill gaps, and to attract, develop, and promote a quality workforce.²⁹ In addition, the Evidence Act directed OPM to identify key skills and competencies needed for program evaluation in an agency.³⁰

General Services Administration (GSA). GSA has broad responsibilities for helping federal agencies obtain the facilities, products, and services they need to serve the public. GSA's Office of Shared Solutions and Performance Improvement supports 12 interagency councils, including the three described earlier. In addition, according to GSA, its Office of Evaluation Sciences helps agencies build and use evidence. For example, it partners with agencies to answer priority questions with rigorous evaluation methods and administrative data.

²⁵OMB is responsible for providing agencies with guidance on their evidence-building and evaluation plans. Pub. L. No. 115-435, § 101(a), 132 Stat. at 5530, *codified at* 5 U.S.C. § 312(a)(6) and (b)(3).

²⁶OMB, Circular No. A-11, § 290.20 (August 2023).

²⁷For example, the Interagency Council on Statistical Policy is headed by the Chief Statistician of the United States, a position within OMB. 44 U.S.C. § 3504(e). OMB also convenes and chairs the Evaluation Officer Council. OMB, Memorandum M-19-23 (2019). In addition, OMB officials serve on the Executive Committee of the Chief Data Officer Council. 44 U.S.C. § 3520A.

²⁸5 U.S.C. § 1103(c).






²⁹5 C.F.R. part 250, subpt. B.

³⁰Pub. L. No. 115-435, § 101(e)(3)(A), 132 Stat. at 5534.

Capacity Assessments

The Evidence Act amended requirements for agency strategic plans, which are now to include an assessment of the agencies' evidence-building activities and capacity. Every 4 years, starting in 2022, agencies are to assess their statistics, evaluation, research, and analysis efforts related to five topics shown in figure 1.³¹ Related OMB implementation guidance included framing questions for agencies to use in addressing the topics.

Figure 1: Capacity Assessment Topics and Related Guidance

Assessment Topics	Framing Question from Office of Management and Budget Guidance
 Coverage	<i>What is happening and where is it happening?</i>
 Quality	<i>Are the data used of high quality with respect to utility, objectivity, and integrity?</i>
 Methods	<i>What are the methods being used for these activities, do these methods incorporate the necessary level of rigor, and are those methods appropriate for the activities to which they are being applied?</i>
 Effectiveness	<i>Are the activities meeting their intended outcomes, including serving the needs of stakeholders and being disseminated?</i>
 Independence	<i>To what extent are the activities being carried out free from bias and inappropriate influence?</i>

Source: Public Law 115-435 and OMB Circular No. A-11 (2023); GAO (icons). | GAO-24-106982

The Evidence Act also lists six specific requirements for agencies to address in their assessments. According to OMB guidance, those specific requirements tie directly to the five assessment topics.³² For example, one requirement is to include a list of activities and operations of the agency that are currently being evaluated or analyzed, which relates to coverage. In addition, two of the requirements relate to agencies'

³¹Pub. L. No. 115-435, § 101(c)(3), 132 Stat. at 5533, *codified at* 5 U.S.C. § 306(a)(9).

³²OMB, Circular No. A-11, § 290.13 (August 2023). OMB originally added Evidence Act implementation guidance to Circular No. A-11 in 2019. Subsequent annual updates largely retained or expanded guidance related to capacity assessments.

capacities to undertake evidence-building activities.³³ The six requirements are discussed later in this report and included in a crosswalk in Appendix I.

According to OMB guidance, the capacity assessments provide agencies with a baseline against which they can measure improvements to their evidence-building activities and ensure that they have sufficient capacity.³⁴ OMB implementation guidance directs Evaluation Officers to lead the development of the capacity assessment, in conjunction with the Statistical Official, Chief Data Officer, and other agency staff.³⁵ OMB guidance also identified agency milestones related to assessment development and publication (see fig. 2).

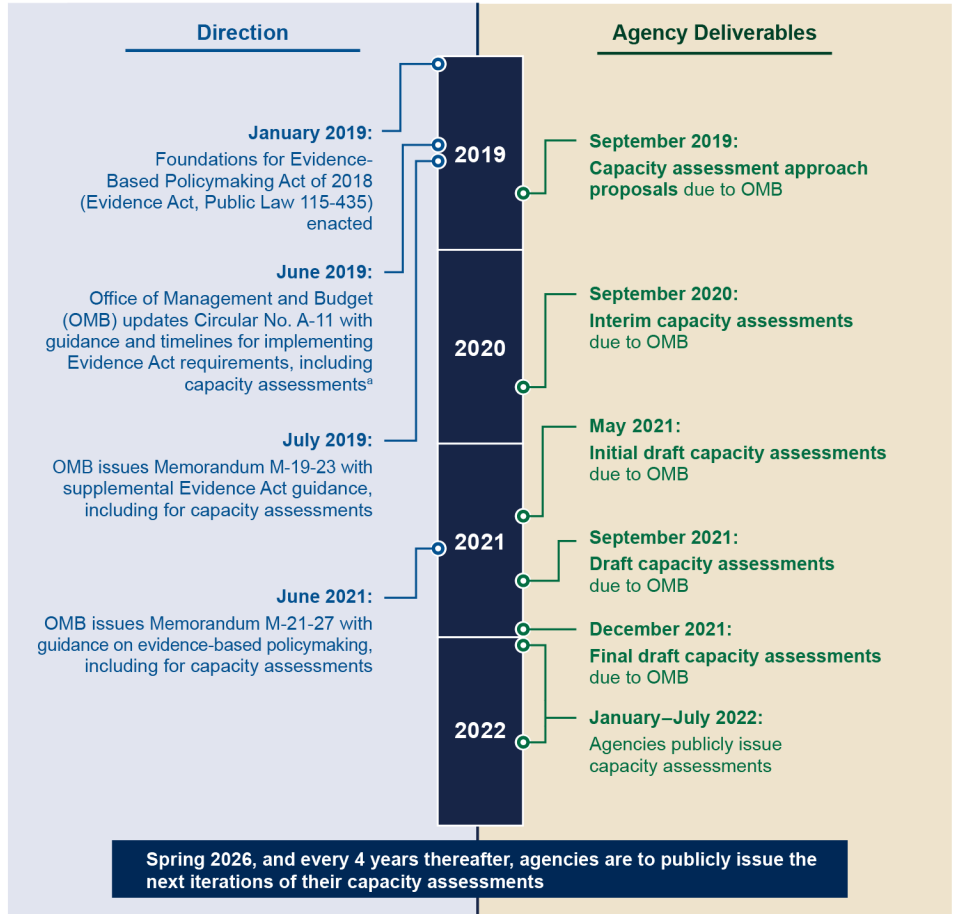
³³Specifically, the Evidence Act requires agencies to assess (1) the extent to which evaluation and research capacity is present within the agency to include personnel and agency processes for planning and implementing evaluation activities, disseminating best practices and findings, and incorporating employee views and feedback; and (2) the extent to which the agency has the capacity to assist agency staff and program offices to develop the capacity to use evaluation research and analysis approaches and data in the day-to-day operations. Pub. L. No. 115-435, §101(c)(3), 132 Stat. at 5533, *codified at* 5 U.S.C. § 306(a)(9).

³⁴OMB, Circular No. A-11, § 290.13 (August 2023).

³⁵OMB, Circular No. A-11, § 290.13 (August 2023). The Evidence Act requires agency Evaluation Officers to “continually assess the coverage, quality, methods, consistency, effectiveness, independence, and balance of the portfolio of evaluations, policy research, and ongoing evaluation activities of the agency.” It also directs Evaluation Officers to assess agency capacity to support the development and use of evaluations. Pub. L. No. 115-435, § 101(a)(1), 132 Stat. at 5531, *codified at* 5 U.S.C. § 313(d)(1),(2).

Figure 2: Key Milestones Related to Capacity Assessment Development and Publication

Capacity Assessment Development



Source: GAO analysis of Public Law 115-435, and related OMB guidance. | GAO-24-106982

^aOMB issues Circular No. A-11 annually, and updated portions of the capacity assessment guidance in subsequent iterations in July 2020, August 2021, August 2022, August 2023, and July 2024.







Agencies Identified Existing Strengths and Opportunities to Enhance Their Evidence-Building Efforts

Agencies Reported Common Strengths and Opportunities

We identified 12 common themes—generally strengths and opportunities—across agencies’ capacity assessments.³⁶ The themes relate to six topics: an overall topic concerning agencies’ capacity to undertake evidence-building activities, as well as the five assessment topics required by the Evidence Act, as described in figure 1 above. Figure 3 identifies the 12 themes by topic.

³⁶We defined capacity assessment findings as “strengths” when agencies reported having capacity, policies, or processes to effectively build and use evidence. Conversely, “opportunities” cover instances where agencies reported ways to enhance their ability to effectively build and use evidence. We did not corroborate or verify the accuracy of agencies’ capacity assessment findings.

Figure 3: Common Themes in Capacity Assessments, by Topic

Topics	Themes
	Agencies identified:
 Capacity	<ol style="list-style-type: none"> 1. Strengths to build one or more source of evidence, including having staff and tools to undertake various evidence-building activities 2. Opportunities to enhance capacity, including hiring new staff and training existing staff
 Coverage	<ol style="list-style-type: none"> 3. Their organizational approach (e.g., centralized vs. dispersed) to evidence-building 4. The programs, operations, and activities covered by their evidence-building activities
 Quality	<ol style="list-style-type: none"> 5. Strengths to ensure evidence quality by following policies and guidance and leveraging expertise 6. Opportunities to enhance the quality of evidence, including by standardizing evidence-building approaches and tools
 Methods	<ol style="list-style-type: none"> 7. Strengths to ensure methods were rigorous and appropriate by following policies and guidance and leveraging expertise 8. Opportunities to enhance capacity for and the implementation of certain methodologies
 Effectiveness	<ol style="list-style-type: none"> 9. Strengths to ensure evidence was useful and used, including by incorporating it into existing decision-making processes 10. Opportunities to enhance use by prioritizing new evidence to meet needs and better disseminating evidence
 Independence	<ol style="list-style-type: none"> 11. Strengths for ensuring independence, including by following relevant policies, guidance, and leading practices 12. Opportunities to enhance independence by revising evidence-building policies, practices, and organizational structures

Source: GAO analysis of agency capacity assessments; GAO (icons). | GAO-24-106982

Below, we present brief summaries of each theme by the topics to which they are related.³⁷ In some cases, the themes represent both strengths and opportunities for enhancement for the same activities. For example,

³⁷We provide additional information, including tables that identify the agencies included in each theme, in appendix II.

as shown in figure 3 for independence, agencies identified strengths and opportunities related to their policies.³⁸

Capacity



Capacity

Does the agency have the staff and tools it needs to collect, analyze, and use evidence?

Source: GAO-23-105460; GAO (icon). | GAO-24-106982

Our review of capacity assessments found variation in capacity across agencies and by source of evidence, consistent with our past findings.³⁹

Strengths. Common strengths related to building one or more source of evidence included

- having staff with the necessary knowledge, skills, and abilities to undertake various evidence-building activities;
- having access to appropriate tools to collect, analyze, and use data and information, such as information technology systems and data analysis software; and
- leveraging third parties—such as partnering with academic institutions and state and local officials or hiring contractors—to support evidence-building activities.⁴⁰

Example: Strengths in Existing Capacity at the Social Security Administration

In its February 2022 capacity assessment, the Social Security Administration reported having sufficient staff, having access to appropriate tools, and leveraging third parties to support evidence-building activities. Staff—in offices such as the Office of Retirement and Disability Policy—provide expertise in supporting other divisions with using evaluation, research, statistics, and data analysis approaches in day-to-day operations. The agency also reported making investments in tools such as its Enterprise Data Warehouse, which provides employees with access to data, as well as the ability to perform analyses. In addition, collaborative programs, such as the Retirement and Disability Research Consortium, fund timely research and evaluation by universities and external research centers.

Source: Social Security Administration fiscal year 2022 capacity assessment. | GAO-24-106982

³⁸There were various reasons for a certain activity being identified as both a strength and opportunity. For example, in some instances, different agencies identified an activity as a strength versus an opportunity. In other instances, the same agency identified an activity as a strength for one or more types of evidence (e.g., statistics), but an opportunity for other types (e.g., evaluation).

³⁹Throughout this section, when we use the term “evidence” or the phrase “source of evidence,” we refer to those covered in capacity assessments: statistics, evaluation, research, and analysis.

⁴⁰See table 1 in appendix II for these sub-themes by agency.

Opportunities. Common opportunities to enhance agencies' capacity for evidence-building activities included

- hiring additional staff with the necessary knowledge, skills, and abilities;
- providing additional training to existing staff to strengthen skill sets;
- acquiring additional or enhanced tools to collect, analyze, and use data and information;
- creating or using existing collaborative mechanisms, such as communities of practice; and
- making additional budgetary resources available, such as through dedicated funding streams.⁴¹

Example: Opportunities to Enhance Capacity at the Department of State

In its April 2022 capacity assessment, the Department of State identified several gaps in its capacity and related opportunities to enhance it. For example, staff with responsibilities for evidence-building activities often focused on performance monitoring, but not other evidence-building activities. To address this, the department is considering hiring specialists in various fields, including data analysis. Officials told us that in July 2023 the department began a recruitment and hiring initiative for data scientists. It hired eight data scientists through the initiative, but open positions remain, officials said.

In addition, department leaders and staff did not always have the skills needed to use evidence to inform policies and programs, officials reported. To improve staff's evaluation skills, in September 2022 the department revived training on managing evaluations and it has since trained over 200 staff. According to officials, the department also began a monthly series in 2022 to highlight its evaluations. The series also includes presentations on basic evaluation skills and innovations in methodological approaches.

Source: Information from Department of State fiscal year 2022 capacity assessment and officials. | GAO-24-106982

⁴¹See table 2 in appendix II for these sub-themes by agency.

Coverage



Coverage

What is happening and where is it happening?

Source: Office of Management and Budget; GAO (icon). | GAO-24-106982

Coverage relates to identifying which agency activities or operations are covered by evidence-building activities (i.e., which are currently being evaluated or analyzed). Our past work has found that agencies take different approaches to organizing their evidence-building activities.⁴² For example, some agencies take a centralized approach, such as establishing an office or component with agency-wide responsibilities for a particular source of evidence (e.g., evaluation or statistical data). Others take a decentralized approach, such as having individual programs develop and use their own performance information.

The two coverage themes reflect our past findings and respond to the framing question in OMB's guidance. Unlike the other themes we identified, the coverage themes generally provide context, rather than identify strengths and opportunities.

Evidence-building organization. Agencies reported on their organizational approach to evidence-building (i.e., where it is happening). Some agencies took a centralized approach for certain sources of evidence, such as having an agency-wide office for evaluation. For others, activities were dispersed across their organization for sources of evidence (e.g., research and analysis). Some agencies reported having both centralized and dispersed evidence-building activities.⁴³

Example: Organizational Approaches to Evidence-Building at the Department of Housing and Urban Development

In its March 2022 capacity assessment, the Department of Housing and Urban Development reported that it has both centralized and dispersed evidence-building activities. Its Office of Policy Development and Research acts as the central office for evaluation, economic and statistical analysis, and data governance for the department. Other aspects of evaluation and analytics are dispersed across the department, including in the Office of Lead Hazard Control and Healthy Homes, the Office of Risk Management, and the Office of Public and Indian Housing.

Source: Department of Housing and Urban Development fiscal year 2022 capacity assessment. | GAO-24-106982

Evidence-building activities. Agencies identified programs, operations, and activities covered by their evidence-building activities (i.e., what is happening). In general, agencies took two approaches to how they

⁴²GAO, *Evidence-Based Policymaking: Selected Agencies Coordinate Activities, but Could Enhance Collaboration*, [GAO-20-119](#) (Washington, D.C.: Dec. 4, 2019).

⁴³See table 3 in appendix II for this theme by agency.

produced their lists of these activities in their 2022 capacity assessments. They either presented lists that

- appeared comprehensive (i.e., agencies did not note any limitations to their lists), or
- represented a subset of all activities, such as those included in their learning agendas or evaluation plans, or those related to their priority goals.⁴⁴

Example: List of Evidence-Building Activities in the Environmental Protection Agency’s Capacity Assessment

The Environmental Protection Agency provided a list of programs being evaluated or analyzed in its March 2022 capacity assessment. The agency stated that the list was developed from its fiscal year 2022 *Evaluation Plan and other Evidence Building Activities*, which describes significant program evaluations and other evidence-building activities the agency plans to undertake. According to the agency, significant evaluations and other evidence-building activities include those that (1) support the agency’s ability to meet a leadership priority, (2) are mandated by Congress, or (3) are being highlighted as a program priority.

Source: Environmental Protection Agency fiscal year 2022 capacity assessment. | GAO-24-106982

⁴⁴The Evidence Act requires agencies to develop evidence-building plans, also known as learning agendas, every four years, as part of their strategic plans. OMB guidance describes a learning agenda as a long-term plan that takes a systematic approach to identifying and addressing policy questions relevant to an agency’s programs, policies, and regulations. The act also requires agencies to develop annual evaluation plans describing activities they plan to conduct as part of their learning agendas. OMB guidance states that these plans should describe evaluation activities for the subsequent year, including the key questions for each planned “significant” evaluation study, as well as the key information collections or acquisitions the agency plans to begin. Pub. L. No. 115-435, § 101(a), 132 Stat. at 5530-5531, *codified* at 5 U.S.C. § 312; OMB, Memorandum M-19-23 (2019). See table 3 in appendix II for this theme by agency.

Quality



Quality

Are the data used of high quality with respect to utility, objectivity, and integrity?

Source: Office of Management and Budget; GAO (icon). | GAO-24-106982

When evidence has sufficient quality, it is more likely to be used in decision-making, according to our past work.⁴⁵ However, we found in July 2021 that decision-makers do not always have access to evidence that meets their quality needs.⁴⁶ In a July 2023 guide on evidence-based policymaking, we highlighted our past work related to assessing the quality of different sources of evidence, including research.⁴⁷ For example, in June 2015, we identified generally accepted research standards that assess quality through questions including:

- Were the data used valid for the study's purposes?
- Were the data used sufficiently reliable for the study's purposes?
- Were any data limitations identified and were the impact of the limitations adequately explained?⁴⁸

Strengths. Common strengths related to ensuring evidence quality included

- following policies and guidance for one or more sources of evidence; and
- leveraging expertise from agency staff or external entities, such as peer reviewers.⁴⁹

Example: Strengths in Ensuring Quality of Evidence at the Department of Health and Human Services

In its March 2022 capacity assessment, the Department of Health and Human Services described various standards and staff expertise that it relies on to ensure quality of evidence. The department reported following federal requirements for statistical agencies, a department-wide policy to ensure the quality of its evaluations, and component-level policies to ensure the quality of its research. The department also reported ensuring quality by having skilled and qualified staff, as well as processes such as internal agency reviews and peer reviews.

Source: Department of Health and Human Services fiscal year 2022 capacity assessment. | GAO-24-106982

⁴⁵[GAO-23-105460](#).

⁴⁶See, for example, [GAO-21-536](#).

⁴⁷[GAO-23-105460](#).

⁴⁸GAO, *Army Combat Vehicles: Industrial Base Study's Approach Met Research Standards*, [GAO-15-548](#) (Washington, D.C.: June 16, 2015).

⁴⁹See table 4 in appendix II for these sub-themes by agency.

Opportunities. Common opportunities to enhance the quality of evidence included

- enhancing relevant policies and practices; and
- standardizing evidence-building activities or tools, such as information technology systems.⁵⁰

Example: Opportunities to Enhance Quality at the Department of Agriculture

In its March 2022 capacity assessment, the Department of Agriculture described several opportunities to enhance the quality of its evidence. For example, the department reported that it would seek to ensure greater adherence to the department's evaluation policy. In April 2024, officials described actions taken and planned towards achieving this goal. These include monthly meetings, hosted by the Performance, Evidence, Evaluation, and Risk unit, that educate staff, share best practices, and demonstrate ongoing evidence and evaluation work. Officials also said that the department plans to update its evaluation policy in 2024 to reflect lessons learned since it published its capacity assessment.

Source: Information from Department of Agriculture fiscal year 2022 capacity assessment and officials. | GAO-24-106982

Methods



Methods

What are the methods being used for these activities, do these methods incorporate the necessary level of rigor, and are those methods appropriate for the activities to which they are being applied?

Source: Office of Management and Budget; GAO (icon). | GAO-24-106982

Our past work has identified key components of methodological design for specific sources of evidence, including methods for conducting evaluations.⁵¹ In addition, OMB guidance notes that the quality of an evaluation depends on the underlying design and methods, implementation, and how findings are interpreted and reported.⁵² It further states that an evaluation must have the most appropriate design and methods to answer key questions, while balancing its goals, scale, timeline, feasibility, and available resources.

Strengths. Common strengths related to approaches agencies take to ensure methods were rigorous and appropriate included

- following policies and guidance for one or more sources of evidence; and

⁵⁰See table 4 in appendix II for these sub-themes by agency.

⁵¹See, for example GAO, *Designing Evaluations: 2012 Revision (Supersedes PEMD-10.1.4)*, [GAO-12-208G](#) (Washington, D.C.: Jan. 31, 2012).

⁵²OMB, Memorandum M-20-12, (Washington, D.C.: Mar 10, 2020). In that guidance, OMB uses the term "design and methods" to collectively address the structure of an evaluation, inclusive of evaluation approach; variables for, conditions under, timing of, and sources from which data are used or collected; and quantitative and qualitative data collection and analysis methods.

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- leveraging expertise from agency staff or external entities, such as peer reviewers.⁵³

Example: Strengths in Ensuring Rigorous and Appropriate Methods at the National Aeronautics and Space Administration

In its March 2022 capacity assessment, the National Aeronautics and Space Administration described standards and staff expertise that it relies on to ensure methodologies used for evidence-building activities are rigorous and appropriate. Specifically, the agency reported that its methods reflect industry standards such as risk and schedule analysis and cost estimating. In addition, agency analysts collaborate across components to help ensure appropriate use of various methods.

Source: National Aeronautics and Space Administration fiscal year 2022 capacity assessment. | GAO-24-106982

Opportunities. Common opportunities included

- enhancing agency data and evaluation methodologies to ensure quality and usefulness; and
- taking actions to enhance organizational capacity for and awareness of different sources of evidence and methods.⁵⁴

Example: Opportunities to Enhance Methodologies at the Office of Personnel Management

In its March 2022 capacity assessment, the Office of Personnel Management identified gaps in evidence-building methodologies and related opportunities to enhance them. Specifically, the agency's survey of managers and senior leaders found technical rigor of evidence activities to be low. To address this issue, through November 2023 the agency increased staffing for a new team within the Office of the Chief Financial Officer's Planning, Performance, and Evaluation Group. This team, first established in September 2020, is responsible for (1) conducting research and evaluation projects in support of the agency's Learning Agenda and Annual Evaluation Plans, (2) developing research guidance, (3) providing relevant training for the agency, and (4) coordinating a research community of practice.

In addition, officials told us in April 2024 that starting in September 2022 the agency integrated evidence sharing into quarterly performance review meetings with senior leadership. Officials also told us that the agency had established peer review processes in December 2021. These processes included verification of findings by other analysts and reviews by internal content experts.

Source: Information from OPM fiscal year 2022 capacity assessment and officials. | GAO-24-106982

⁵³See table 5 in appendix II for these sub-themes by agency.

⁵⁴See table 5 in appendix II for these sub-themes by agency.

Effectiveness



Effectiveness

Are the activities meeting their intended outcomes, including serving the needs of stakeholders and being disseminated?

Source: Office of Management and Budget; GAO (icon). | GAO-24-106982

Decision-makers generally have access to one or more sources of evidence, but they do not always use it in decision-making, according to our past work.⁵⁵ In July 2023, we identified key practices and related actions to help federal leaders and employees use evidence in a range of decision-making activities.⁵⁶ For example, one practice is to use evidence to learn, by assessing progress towards goals and developing an understanding of why results were achieved. We also illustrated different types of decisions evidence can inform, including when identifying priorities, developing strategies, and allocating resources.

Strengths. Common strengths to ensure that evidence was both useful and used involved

- building evidence to meet the identified needs of decision-makers; and
- incorporating the use of evidence into existing decision-making processes.⁵⁷

Example: Building Evidence to Meet Stakeholder Needs at the Department of Education

In its July 2022 capacity assessment, the Department of Education identified building evidence on effective strategies to support students' academic, social, emotional, and career-development needs as a particular strength. For example, prior research found that focusing on various activities, including career development, may improve a range of outcomes for all students. Starting in 2018, the Office of Career, Technical, and Adult Education provided funding for an Institute of Education Sciences research network that carried out six studies on career and technical education interventions. The studies found that participants who received those interventions had higher rates of high school graduation, college enrollment, and degree attainment, among other outcomes.

The department's Fiscal Years 2022-2026 Learning Agenda—which incorporated input from stakeholders on their evidence needs—identified activities to generate additional evidence on the impact of career and technical education on student success in education and the workforce. According to officials, at the end of fiscal year 2023, the department's Institute of Education Sciences partnered with the Office of Career, Technical, and Adult Education to provide additional research grant funding to expand the evidence base on effective practices in career and technical education.

Source: Information from Department of Education fiscal year 2022 capacity assessment and officials. | GAO-24-106982

⁵⁵[GAO-21-536](#).

⁵⁶[GAO-23-105460](#). To identify these practices, we reviewed (1) federal laws and guidance related to evidence-building and performance-management activities and (2) our related past reports. We identified and distilled several hundred relevant actions into 13 key practices. We then refined the practices and actions, as appropriate, based on input from cognizant officials at 24 major federal agencies and OMB staff. We identified three key practices related to using evidence.

⁵⁷See table 6 in appendix II for these sub-themes by agency.

Opportunities. Common opportunities to enhance the use of evidence included

- prioritizing building new evidence to meet decision-maker and stakeholder needs; and
- better disseminating evidence.⁵⁸

Example: Opportunities to Enhance Use of Evidence at the Department of Transportation

In its March 2022 capacity assessment, the Department of Transportation identified a gap in evidence to meet decision-maker and stakeholder needs and described opportunities to address this gap. The department reported that data availability was an impediment to using evidence to advance transportation equity. According to officials, the department developed an action plan in February 2023 with three phases to address this issue. Plan phases include (1) exploring the use of existing data to model effects by demographic groups; (2) conducting a feasibility study for data collection options, potentially to include original data collection and sharing data within the department and publicly; and (3) implementing the data collection option chosen through the feasibility study, assuming available funds. Officials told us in April 2024, that the department was in the process of conducting the feasibility study.

Source: Information from Department of Transportation fiscal year 2022 capacity assessment and officials. | GAO-24-106982

Independence



Independence

To what extent are the activities being carried out free from bias and inappropriate influence?

Source: Office of Management and Budget; GAO (icon). | GAO-24-106982

Our past work and relevant OMB guidance highlight the importance of independence related to building certain sources of evidence. For example, we both highlight the importance of independence for program evaluation.⁵⁹ In addition, OMB guidance states that a federal statistical agency must be independent from political and other undue external influence in developing, producing, and disseminating statistics.⁶⁰

Strengths. Common approaches to ensuring independence involved

- following relevant policies, guidance, or leading practices; and

⁵⁸See table 6 in appendix II for these sub-themes by agency.

⁵⁹See, for example, GAO, *Program Evaluation: Key Terms and Concepts*, [GAO-21-404SP](#) (Washington, D.C.: Mar 22, 2021); and OMB, Memorandum M-20-12, (Washington, D.C.: Mar 10, 2020).

⁶⁰OMB, *Statistical Policy Directive No. 1: Fundamental Responsibilities of Federal Statistical Agencies and Recognized Statistical Units*, 79 Fed. Reg. 71,610, 71,612 (Dec. 2, 2014).

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- separating certain evidence-building activities from other agency functions, such as policymaking and implementation activities.⁶¹

Example: Ensuring Independence at the United States Agency for International Development

In its March 2022 capacity assessment, the United States Agency for International Development reported following relevant policies and dividing responsibilities to ensure independence of evidence. The agency reported that its required evaluations are conducted by a team external to both the agency and its implementation partners to ensure functional independence. In addition, external evaluation team members are required to sign a statement attesting to a lack of conflict of interest or describing an existing conflict of interest relative to the project under evaluation.

Source: United States Agency for International Development fiscal year 2022 capacity assessment. | GAO-24-106982

Opportunities. Common opportunities to enhance the independence of evidence involved revising evidence-building policies, practices, and organizational structures.⁶²

Example: Opportunities to Enhance Independence at the Department of Veterans Affairs

The Department of Veterans Affairs reported in its April 2022 capacity assessment that responsibility for evidence-building activities—including for evaluation—are generally dispersed across the department. As a result, it had not established or enforced a single set of department-wide standards for evaluation, including related to independence. The department identified opportunities to ensure independence by establishing better oversight of its evaluation activities.

In April 2024, officials told us that the department had chartered several organizations to address these issues. For example, the department’s Office of Enterprise Integration established the Evidence-Based Policy Council to serve as the executive-level sponsor of program evaluations. Various working groups have developed tools to establish program evaluation standards and expectations. These tools also identify policy principles, such as independence, that apply when conducting evaluations. These actions help ensure that organizations across the department use a common set of principles and approaches to produce independent evaluations.

Source: Information from Department of Veterans Affairs fiscal year 2022 capacity assessment and officials. | GAO-24-106982

Actions to Enhance Federal Evidence-Building Activities and Capacity

In addition to the actions agencies identified in their capacity assessments, OMB, OPM, GSA, and interagency councils have taken actions to enhance federal evidence-building activities and capacity.

⁶¹See table 7 in appendix II for these sub-themes by agency.

⁶²See table 7 in appendix II for this sub-theme by agency.

These actions often align with agency findings and the themes we identified. Below, we highlight examples of the actions they have taken.

OMB. According to the President’s Budget for Fiscal Year 2025 and OMB staff, OMB has undertaken various activities to enhance agency capacity.

- OMB partnered with the Department of Health and Human Services and evaluation experts to develop the Federal Evaluation Toolkit. The web-based toolkit, launched in January 2024, includes information on the basics of evaluation, working with evaluators, and how to use evaluation findings. The toolkit is intended to help address gaps in staff skills and knowledge around evaluation.
- OMB has also made resources available for agencies’ evidence building work. Its Evidence and Evaluation Community of Practice has coordinated over 75 workshops and training sessions on evidence and evaluation topics since 2018 for executive branch staff. According to the President’s Budget for Fiscal Year 2025, participant feedback on the workshops has found that attendees view the content as a helpful source of insights that will enhance their contributions to their own office. This community of practice has an associated website—with access limited to Executive Branch employees—that includes resources related to Evidence Act implementation, program evaluation, and other evidence-building approaches. In August 2021, OMB, in partnership with GSA, also launched the public-facing website, [Evaluation.gov](https://www.evaluation.gov). The website serves as the home for all deliverables required by the Evidence Act and other tools and resources.
- Additionally, OMB partnered with the Federal Executive Institute in OPM to offer an Evidence-Based Decision-Making Leadership Academy for members of the Senior Executive Service. The Academy aims to provide agency leaders with the tools needed to ground their decision-making in the best available evidence while also building a learning culture within their agencies. At the conclusion of the Academy, leaders leave with an action plan to advance evidence-based decision-making in their agencies.

OPM. In November 2023, OPM released a program evaluation competency model, comprised of 33 different competencies. According to OPM, it consulted subject matter experts and solicited feedback via focus groups and government-wide surveys to identify key skills and competencies. OPM used the qualitative and quantitative evidence collected to comprehensively cover federal program evaluation work and validate a competency model. The model covers both general and

technical competencies and is intended for agencies to use in workforce planning, recruitment, employee selection, training and development, and performance management of their program evaluation positions.⁶³

GSA. In August 2023, GSA announced a multiyear partnership with the OMB Evidence Team to address challenges agencies had in identifying and connecting with highly skilled contractors to meet critical evaluation needs. This effort identified qualified, pre-vetted contractors that can be selected by agencies to design and execute program evaluations.

Interagency Councils. Interagency councils have also taken actions to enhance agency capacity.

- As we reported in December 2022, the Chief Data Officer Council’s Data Inventory Working Group released a report in April 2022 recommending practices to help agencies develop inventories of their data assets.⁶⁴ Data assets are a collection of data elements or data sets that may be grouped together. For example, the report states that an agency’s inventory should be designed to give staff and the public a clear, comprehensive understanding of the data assets the agency possesses. That inventory should also provide information on how the public can access or request access to an asset.
- According to OMB officials, the Evaluation Officer Council has similarly undertaken activities to build and strengthen capacity through peer sharing and other community building efforts. For example, the Interagency Council on Evaluation Policy, a working group of the Evaluation Officer Council, has hosted several workshops for federal staff on evaluation and evidence topics. Interagency Council on Evaluation Policy members also provide technical assistance to agencies on evaluation and related topics through direct engagement and monthly open office hours.
- According to the President’s Budget for Fiscal Year 2025, members of the Interagency Council on Statistical Policy work collaboratively to set strategic goals to modernize the federal statistical system, ensure data quality, provide safe and appropriate access to data, and enhance coordination and collaboration across the system. In April 2023, the federal statistical system launched a new public facing website, StatsPolicy.gov. The website provides information about the

⁶³Office of Personnel Management, *Foundations for Evidence-Based Policymaking Act of 2018 – Program Evaluation Competency Model*, (Washington, D.C.: Nov. 8, 2023).

⁶⁴[GAO-23-105514](#).

federal statistical system, the Interagency Council on Statistical Policy, and the Office of the Chief Statistician.

Agencies Identified Benefits and Some Challenges That OMB Has Opportunities to Address with Future Capacity Assessments

Benefits and Challenges Related to Agencies' Initial Development of Capacity Assessments

Officials from 21 agencies identified common benefits and challenges specific to the development of their first iteration of the capacity assessments.⁶⁵ These related to

- identifying existing evidence-building activities and capacity (benefit and challenge),
- understanding evidence-related concepts and terminology (benefit and challenge), and
- working within time and resource constraints (challenge).

Officials did not expect these challenges to continue when they develop future capacity assessments. Officials either overcame these challenges—which then led to a benefit, as indicated for the first two items above—or they were unique to undertaking these efforts for the first time.

Identifying existing evidence-building activities and capacity.

Officials from 18 agencies told us they faced challenges identifying evidence-building activities and their related capacity, but they realized benefits through the capacity assessment process. Evidence-building activities can be fragmented within agencies and occur at multiple levels

⁶⁵Officials we interviewed at all 23 agencies identified benefits or challenges related to developing their first capacity assessments. However, some of those benefits and challenges were unique to the agency. In this section, we present benefits and challenges that were common across multiple agencies, which ranged from eight to 21 agencies.

and entities within and across the agencies.⁶⁶ Given this fragmentation, officials told us it was difficult to identify what constituted evidence-building activities, where they took place within their agencies, and who was responsible for them.

At the same time, developing the capacity assessments helped agency officials better understand evidence-building activities and leverage existing capacity. Officials said although they were previously aware of some aspects of their agency's capacity, the development process provided an opportunity to systematically review and reflect on it. In addition, the development process helped them form and strengthen connections among evidence-related staff across different offices. They also said the process led to increased collaboration among agency officials with responsibilities for implementing the Evidence Act.⁶⁷ Officials told us these connections have been beneficial for coordinating other Evidence Act work and for supporting evidence building more generally.

Understanding evidence-related concepts and terminology. Officials from 12 agencies told us staff do not have a common understanding of evidence-related concepts and terminology. This challenge hindered their ability to assess their agency's evidence-building activities and capacity. For example, they told us staff conflated evaluation with other sources of evidence, such as research studies or audits, when answering surveys or interviews for the capacity assessment. Therefore, they may not have accurately assessed specific sources of evidence, such as evaluations.

The Evidence Act defines evaluation as “an assessment using systematic data collection and analysis of one of more programs, policies, and organizations intended to assess their effectiveness and efficiency.”⁶⁸ Evaluations can answer specific types of questions. For instance, a

⁶⁶GAO-20-119. We found that within agencies, many organizations have evidence-building responsibilities, including statistical agencies and programs, evaluation and policy research offices, performance management offices, policy analysis offices, and program administrators. When those activities are well coordinated, it can help improve an agency's capacity to fully address a specific research or policy question.

⁶⁷The Evidence Act directed CFO Act agencies to designate three Evidence Officials to ensure effective implementation of the law: an Evaluation Officer, a Chief Data Officer, and a Statistical Official. These officials have responsibilities as specified in the Evidence Act. See Pub. L. No. 115-435, §§ 101(a)(1), 202(e)(1), 132 Stat. at 5531, 5541, *codified at* 5 U.S.C. §§ 313, 314; 44 U.S.C. § 3520. The requirement to designate a Chief Data Officer applies to entities beyond the 24 CFO Act agencies. See 44 U.S.C. § 3502(1).

⁶⁸Pub. L. No. 115-435, § 101(a)(1), 132 Stat. at 5530, *codified at* 5 U.S.C. § 311(3).

program evaluation can provide insights on whether a program is working and why.⁶⁹

Despite these challenges, the process of developing the capacity assessments presented an opportunity for staff to strengthen their knowledge of evidence-related concepts, agency officials said. For example, agency officials said they organized learning around these concepts for staff, including through tailored workshops on the Evidence Act. Officials said they now have greater assurance that staff have a common understanding of evidence concepts to provide comparable information for future assessments.

Working within time and resource constraints. Agency officials also identified time and resource challenges that were unique to conducting capacity assessments for the first time.

Officials from 16 agencies described challenges producing the assessment with constrained resources, including a limited time frame. Officials told us they faced challenges developing their assessments while simultaneously working on other Evidence Act responsibilities.⁷⁰ For example, agencies had approximately 1 year to conduct the capacity assessment and submit their first draft to OMB for review.⁷¹ Moving forward, agencies will have greater lead time to conduct their assessments, which as noted above are to be produced every 4 years.⁷²

Additionally, agency officials said they faced challenges producing their capacity assessments with limited resources. To meet the new Evidence Act requirements, officials redirected staff and budgetary resources. For example, they used funds otherwise marked for evaluations or they enhanced their capacity by using contractors. In the Analytical Perspectives volume of the Fiscal Year 2024 Budget of the U.S. Government, OMB noted that the proposed budget ensured all major

⁶⁹GAO-21-404SP. In addition, to determine the effectiveness of programs, evaluations must meet certain standards, such as employing methods appropriate for their purpose and being implemented by qualified evaluators. See OMB, Memorandum M-20-12 (2020).

⁷⁰The Evidence Act established various agency deliverables—including Evidence-Building Plans (also referred to as Learning Agendas), Evaluation Plans, and Capacity Assessments—to be completed simultaneously within a short timeframe. Pub. L. No. 115-435, §§ 101(a)(1), (c), 132 Stat. at 5530–5531, 5533, *codified at* 5 U.S.C. §§ 306(a)(9), 312.

⁷¹We provided a timeline of selected milestones related to capacity assessment development and publication in figure 2.

⁷²5 U.S.C. § 306(a).

agencies had some dedicated evaluation staff to support the Evaluation Officer. In our interviews with agency officials in January and February 2024, they told us that their agencies now have more staff supporting this function.

Agency Officials Identified Unresolved Challenges Related to Limited Guidance and Information about Assessment Methodologies

Officials from 18 of 23 agencies identified common, unresolved challenges related to developing capacity assessments. These challenges involved (1) interpreting guidance, (2) understanding how the assessment would be used, and (3) identifying appropriate methodologies for conducting the capacity assessment.

The first two challenges related to OMB's guidance for capacity assessments.

Interpreting guidance. Officials from 13 agencies said they faced challenges interpreting capacity assessment topics and related guidance. In its guidance, OMB encouraged agencies to use a format, process, and structure that best meets their specific context.⁷³ Officials told us they appreciated the flexibility to tailor their approach to the agency's specific needs, but the limited guidance led to a lack of clarity surrounding the assessment topics and requirements.

As noted earlier, the Evidence Act directs agencies to assess the coverage, quality, methods, effectiveness, and independence of their evidence-building activities. However, the act does not define any of those terms or how to assess them. To assist with this, OMB's guidance provides a question to help frame agencies' assessments for each of the five topics, as depicted in figure 1 earlier in this report.⁷⁴ In addition to the five topics, the law also establishes six specific requirements (see text box below).

⁷³OMB, Circular No. A-11, § 290.13 (August 2023).

⁷⁴OMB, Circular No. A-11, § 290.13 (August 2023).

Specific Requirements for Capacity Assessments from the Evidence Act

1. A list of the activities and operations of the agency that are currently being evaluated and analyzed;
2. The extent to which the evaluations, research, and analysis efforts and related activities of the agency support the needs of various divisions within the agency;
3. The extent to which the evaluation research and analysis efforts and related activities of the agency address an appropriate balance between needs related to organizational learning, ongoing program management, performance management, strategic management, interagency and private sector coordination, internal and external oversight, and accountability;
4. The extent to which the agency uses methods and combinations of methods that are appropriate to agency divisions and the corresponding research questions being addressed, including an appropriate combination of formative and summative evaluation research and analysis approaches;
5. The extent to which evaluation and research capacity is present within the agency to include personnel and agency processes for planning and implementing evaluation activities, disseminating best practices and findings, and incorporating employee views and feedback; and
6. The extent to which the agency has the capacity to assist agency staff and program offices to develop the capacity to use evaluation research and analysis approaches and data in the day-to-day operations.

Source: 5 U.S.C. § 306(a)(9). | GAO-24-106982

OMB guidance does not provide information to help agencies interpret and address these six specific requirements. As was described earlier, the guidance lists the requirements and states how they relate to the assessment topics. However, it does not offer other information, such as defining key terms or providing examples, which would help agencies interpret and address those requirements. As a result, we found that interpretations of the assessment topics and requirements varied across the 23 agencies' capacity assessments. Therefore, the information they presented was not always comparable. For example, we saw variation in how agencies interpreted and addressed the requirement related to ensuring evidence-building activities were balanced across different needs (see specific requirement 3 in text box above). This variation included instances where agencies

- focused on how they addressed different organizational needs, but did not assess whether those items were balanced appropriately (six agencies); and

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- assessed how they balanced evidence-building activities generally but did not discuss balance across different organizational needs (three agencies).

Understanding the assessment’s intent and use. Officials from eight agencies described challenges understanding the intent and potential uses of their assessment results. For example, they did not know how outside entities would use the information presented in their capacity assessment and whether it might affect budget formulation and appropriations decisions. OMB guidance states that the capacity assessment will “provide senior officials with information needed to improve the agency’s ability to support the development and use of evaluation, coordinate and increase technical expertise available for evaluation and related research activities within the agency, and improve the quality of evaluations and knowledge of evaluation methodology and standards.”⁷⁵ However, the guidance does not specify how agencies might present their assessment results to ensure they are useful for decision-makers and stakeholders within and external to agencies.

As a result, we found variation in how agencies presented their findings, limiting comparability. For example, nine agencies used maturity models to rate their evidence-building activities and capacity.⁷⁶ In those instances, agencies presented a clear picture of their existing strengths and opportunities for enhancement. In three instances, agencies generally framed their findings as opportunities or recommendations on how to improve evidence-building activities and capacity without fully identifying underlying gaps. Officials from two of these three agencies told us they also produced a more detailed internal version of the capacity assessment that identified gaps. However, they did not include this information in the public-facing version sometimes due to concerns voiced by leadership or staff on how it may be perceived.

⁷⁵OMB, Circular No. A-11, § 290.13 (August 2023). Guidance further clarifies that “[a]gencies should use and apply the information generated to make the improvements needed to enhance their capacity in these areas.” OMB also directs agencies to “use updates to the Capacity Assessment to both describe how they are building capacity to address gaps identified in the original document and to identify new or emerging gaps in capacity.”

⁷⁶A maturity model is a framework for measuring the maturity of an organization or one of its functions. Maturity refers to the level of an organization’s abilities along a scale, such as from low to high. In the context of conducting capacity assessments, agencies used models that measured their ability to undertake various aspects of building and using evidence.

OMB has broad responsibilities related to federal evidence building and developing guidance, including for the capacity assessment.⁷⁷ OMB staff told us in December 2023 that before finalizing annual guidance that covers Evidence Act implementation, they provide agencies an opportunity to comment on it. However, agency officials told us that they had not fully thought through these challenges or the need for additional guidance to resolve them until we held discussions with them. Because agencies only conduct capacity assessments once every 4 years, with the next ones due in 2026, officials had been focused on other ongoing activities.

The Evaluation Officer Council, chaired by OMB, serves as a forum for agencies to exchange information, and coordinate and collaborate on areas of common interest, including development of the capacity assessment and other deliverables required by the Evidence Act.⁷⁸ Leveraging the Evaluation Officer Council to identify agency needs for additional guidance could help OMB ensure that agencies provide more comparable information in future capacity assessments. This would help decision-makers and stakeholders more easily identify and address common opportunities and challenges across agencies. It would also help agencies learn from one another, allowing them to identify actions other agencies have taken to enhance their evidence-building activities and capacity.

Determining appropriate assessment methodologies. Officials from 13 agencies described challenges identifying, developing, and implementing methodologies for conducting their capacity assessments. Officials told us they used different methodologies to assess their evidence-building capacity, and sometimes the methodologies did not result in useful or actionable information. Agencies used methodologies including maturity models, surveys, focus groups, and data calls, among others.

Officials described challenges associated with different methodologies. For example, officials from nine agencies said that they used surveys to

⁷⁷OMB is responsible for providing agencies with guidance on their evidence-building and evaluation plans. Pub. L. No. 115-435, § 101(a), 132 Stat. at 5530, *codified at* 5 U.S.C. § 312(a)(6) and (b)(3). In addition, in its guidance, OMB describes its role in Evidence Act implementation, which includes working with agencies on deliverables, providing technical assistance, clarifying direction, and offering other support as needed. OMB, Circular A-11, § 290.20 (August 2023).

⁷⁸OMB, Memorandum M-19-23.

capture a breadth of staff perspectives. Of those, seven agencies described challenges with survey design, administration, and outcomes. Surveys often use close-ended questions, which do not allow respondents to expand on why they responded in a certain way. Agency officials told us it was therefore difficult to identify the cause of an issue, which limited the usefulness of the results (i.e., it was not always clear what actions were needed). In contrast, officials from five agencies said that they used structured interviews, which allowed them to gather in-depth information and probe individuals about the root cause of an issue. However, they described challenges with these interviews, including that they were time intensive and involved fewer staff, limiting how applicable the results were across the agency more broadly.

According to OMB staff, the Evaluation Officer Council held four sessions focused on capacity assessments between 2019 and 2021 while agencies were developing their initial assessments.⁷⁹ Officials from 21 agencies told us that information sharing during those meetings—as well as directly from OMB staff and officials from other agencies outside these meetings—helped inform their capacity assessment development. In some cases, they told us they were able to leverage methodologies shared by other agencies depending on whether they were appropriate for their own agency’s context, including factors such as mission and size, among others.

Since the initial capacity assessments were published in 2022, two agencies have conducted and published updates.⁸⁰ In addition, according to OMB staff in May 2024, multiple agencies are continually assessing their evidence-building capacity. However, Evaluation Officer Council sessions since 2021 generally have not focused on capacity assessments or identifying and sharing information about effective methodologies for conducting those assessments.⁸¹

⁷⁹The four specific sessions were December 2019, August 2020, April 2021, and May 2021. More recently, the April 2024 Evaluation Officer Council session also focused on capacity assessments. In addition, OMB also conducted a workshop in January 2020 for executive branch employees focused on capacity assessments.

⁸⁰As of May 2024, the Department of Health and Human Services and Nuclear Regulatory Commission had published capacity assessment updates.

⁸¹In May 2024, OMB staff told us that the April 2024 Council meeting included agency officials sharing information about efforts to continually assess evidence-building capacity.

According to OMB staff, the Council has focused on a range of topics to address the ongoing needs of its members and the federal evaluation and evidence community.

As of May 2024, the Evaluation Officer Council had not undertaken a systematic effort to identify, document, and share lessons learned on effective methodologies for capacity assessments with agencies. According to our prior work, federal entities should take those actions regarding lessons learned to limit the chance of recurrence of previous difficulties.⁸² By doing so, OMB could ensure that the Evaluation Officer Council helps agencies make appropriate methodological decisions to ensure their ongoing and future capacity assessment efforts consistently provide useful information.

In addition, agencies are assessing their evidence-building capacity at different intervals—some continually, others every 4 years as required by the Evidence Act. Periodically undertaking efforts to identify, document, and share any new lessons learned could further help ensure agency officials are able to make informed decisions moving forward.

Documenting lessons learned is particularly important to ensure this knowledge is not lost when agency officials and staff leave their positions. Officials from 12 agencies told us that since they issued their capacity assessments, there has been turnover in multiple offices and positions involved in developing them, including the Evaluation Officer position in several instances.

Conclusions

Federal decision-makers and stakeholders rely on evidence to ensure federal programs are effectively implemented and achieve results. Despite government-wide actions to enhance federal evidence-building activities, agencies continue to face challenges in ensuring they have sufficient capacity. Agency capacity assessments provide important insights on evidence-building activities and capacity across the federal government.

⁸²For example, GAO, *Veterans Employment: Identifying Lessons Learned from Rapid Retraining Program Could Benefit Future Efforts*, [GAO-23-106191](#) (Washington, D.C.: Sep. 28, 2023); and *Project Management: DOE and NNSA Should Improve Their Lessons-Learned Process for Capital Asset Projects*, [GAO-19-25](#) (Washington, D.C.: Dec. 21, 2018). These reports identified practices based on a review of prior GAO work as well as work from the Center for Army Lessons Learned and the Project Management Institute.

However, limited guidance and information about lessons learned hindered agencies' ability to produce comparable and actionable assessments. Addressing these challenges could lead to more useful information. Decision-makers and stakeholders would be better positioned to understand and take further actions to enhance evidence-building activities and capacity at individual agencies and across the federal government.

Recommendations for Executive Action

We are making the following two recommendations to OMB:

The Director of OMB should leverage the Evaluation Officer Council to identify agency officials' needs for additional guidance on capacity assessments and address them accordingly. (Recommendation 1)

The Director of OMB should leverage the Evaluation Officer Council to identify, document, and share lessons learned from agency officials on capacity assessment methods. This could be done periodically to ensure any new lessons are captured. (Recommendation 2)

Agency Comments

We provided a draft of this report to OMB and the 24 CFO Act agencies for review and comment.

In written comments reprinted in Appendix III, OMB neither agreed nor disagreed with our recommendations and stated that it would take them into consideration during future engagements with the Evaluation Officer Council. OMB also described its efforts, and those of the Council, to support agencies as they assess and improve their evidence-building capacity.

Four agencies—the Department of the Treasury, Nuclear Regulatory Commission, Social Security Administration, and U.S. Agency for International Development—provided written comments, which are reprinted in appendixes IV, V, VI, and VII respectively. The Department of the Treasury provided information about actions it has taken to enhance its evidence-building capacity, and stated it would use our report to inform the next iteration of its capacity assessment. The Nuclear Regulatory Commission and the Social Security Administration stated that they had no comments on our report. The U.S. Agency for International Development summarized findings from our report and stated that it would continue to strengthen its capacity to build and use evidence in decision-making.

The Department of Agriculture, in comments via email, stated that it agreed with our findings and recommendations. It supported the involvement of the Evaluation Officer Council in clarifying capacity assessment requirements, which it stated would help preserve flexibilities to meet legal requirements and agency needs. The department also suggested that the relationship between agency strategic planning and Evidence Act implementation could be explored further.

In addition, three agencies—OMB and the Departments of Education and State—provided technical comments, which we incorporated as appropriate.

Seventeen agencies informed us that they had no comments: the Departments of Commerce, Defense, Energy, Health and Human Services, Homeland Security, Housing and Urban Development, the Interior, Justice, Labor, Transportation, and Veterans Affairs; Environmental Protection Agency; GSA; OPM; National Aeronautics and Space Administration; National Science Foundation; and Small Business Administration.

We are sending copies of this report to appropriate congressional committees, the Director of OMB, the heads of each of the 24 agencies, and other interested parties. This report will also be available at no charge on the GAO website at <https://www.gao.gov>. If you or your staff have any questions about this report, please contact Dawn Locke at (202) 512-6806 or LockeD@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of our report. Key contributors to this report are listed in appendix VIII.



Dawn G. Locke
Director, Strategic Issues

List of Committees

The Honorable Gary C. Peters
Chairman
The Honorable Rand Paul, M.D.
Ranking Member
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Richard Blumenthal
Chairman
The Honorable Ron Johnson
Ranking Member
Permanent Subcommittee on Investigations
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Kyrsten Sinema
Chair
The Honorable James Lankford
Ranking Member
Subcommittee on Government Operations and Border Management
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable James Comer
Chairman
The Honorable Jamie Raskin
Ranking Member
Committee on Oversight and Accountability
House of Representatives

The Honorable Nancy Mace
Chairwoman
The Honorable Gerald E. Connolly
Ranking Member
Subcommittee on Cybersecurity, Information Technology, and
Government Innovation
Committee on Oversight and Accountability
House of Representatives

The Honorable Pete Sessions
Chairman
The Honorable Kweisi Mfume
Ranking Member
Subcommittee on Government Operations and the Federal Workforce
Committee on Oversight and Accountability
House of Representatives

Appendix I: Capacity Assessment Requirements and Guidance

The Foundations for Evidence-Based Policymaking Act of 2018 (Evidence Act) amended requirements for agency strategic plans, which are now to include an assessment of the agencies' evidence-building activities and capacity. Every 4 years, starting in 2022, agencies are to assess their statistics, evaluation, research, and analysis efforts related to five topics.¹ Related OMB implementation guidance included framing questions for agencies to use in addressing the five topics.

The Evidence Act also lists six specific requirements for agencies to address in their assessments. According to OMB guidance, those specific requirements tie directly to the five assessment topics.² In addition, two of the requirements relate to agencies' capacities to undertake evidence-building activities.³

Figure 4 identifies the five assessment topics along with the related framing questions from OMB's guidance and six specific requirements.







¹Pub. L. No. 115-435, § 101(c)(3), 132 Stat. at 5533, *codified at* 5 U.S.C. § 306(a)(9).

²OMB, Circular No. A-11, § 290.13 (August 2023).

³Specifically, the Evidence Act requires agencies to assess (1) the extent to which evaluation and research capacity is present within the agency to include personnel and agency processes for planning and implementing evaluation activities, disseminating best practices and findings, and incorporating employee views and feedback; and (2) the extent to which the agency has the capacity to assist agency staff and program offices to develop the capacity to use evaluation research and analysis approaches and data in the day-to-day operations. Pub. L. No. 115-435, § 101(c)(3), 132 Stat. at 5533, *codified at* 5 U.S.C. § 306(a)(9).

**Appendix I: Capacity Assessment
Requirements and Guidance**

Figure 4: Capacity Assessment Requirements and Related Guidance

Assessment Topics	Framing Question from Office of Management and Budget Guidance	Related Specific Requirements
 Coverage	<i>What is happening and where is it happening?</i>	A list of the activities and operations of the agency that are currently being evaluated and analyzed
 Quality	<i>Are the data used of high quality with respect to utility, objectivity, and integrity?</i>	Not applicable
 Methods	<i>What are the methods being used for these activities, do these methods incorporate the necessary level of rigor, and are those methods appropriate for the activities to which they are being applied?</i>	The extent to which the agency uses methods and combinations of methods that are appropriate to agency divisions and the corresponding research questions being addressed, including an appropriate combination of formative and consummative evaluation research and analysis approaches
 Effectiveness	<i>Are the activities meeting their intended outcomes, including serving the needs of stakeholders and being disseminated?</i>	The extent to which the evaluation research and analysis efforts and related activities of the agency address an appropriate balance between needs related to organizational learning, ongoing program management, performance management, strategic management, interagency and private sector coordination, internal and external oversight, and accountability The extent to which the evaluations, research, and analysis efforts and related activities of the agency support the needs of various divisions within the agency
 Independence	<i>To what extent are the activities being carried out free from bias and inappropriate influence?</i>	Not applicable
Additional Topic ^a		Related Specific Requirement
 Capacity		The extent to which the agency has the capacity to assist agency staff and program offices to develop the capacity to use evaluation research and analysis approaches and data in the day-to-day operations The extent to which evaluation and research capacity is present within the agency to include personnel and agency processes for planning and implementing evaluation activities, disseminating best practices and findings, and incorporating employee views and feedback

Source: GAO analysis of Public Law 115-435 and OMB Circular No. A-11 (2023); GAO (icons). | GAO-24-106982

Note: According to Office of Management and Budget guidance, the six specific requirements tie directly to the assessment topics. The guidance provides examples of how three specific requirements relate to coverage and effectiveness, as shown in the crosswalk above. The relationship for the remaining three requirements to methods and capacity are based on our interpretation.

^aThe Foundations for Evidence-Based Policymaking Act of 2018 does not list “capacity” as an assessment topic. However, two of the specific requirements relate to agencies’ capacities to undertake evidence-building activities.

Appendix II: Capacity Assessment Themes by Agency

As described earlier in this report, we identified 12 common themes—generally strengths and opportunities—across agencies’ capacity assessments.¹ Those themes relate to six topics agencies covered in their capacity assessments: (1) capacity, (2) coverage, (3) quality, (4) methods, (5) effectiveness, and (6) independence.²

Most themes (11 of the 12) involved a majority of the 23 agencies, ranging from 12 to 21.³ The agencies not included in themes generally covered the six related topics in their capacity assessments. The findings they identified related to those topics were unique and different from those identified by the other agencies, and therefore were not included in our themes.

The tables below illustrate which agencies are included in each theme.

¹We defined capacity assessment findings as “strengths” when agencies reported having capacity, policies, or processes to effectively build and use evidence. Conversely, “opportunities” cover instances where agencies reported ways to enhance their ability to effectively build and use evidence.

²To identify themes across assessments, we conducted a structured content analysis of the capacity assessments issued by 23 agencies in 2022. Prior to beginning the content analysis, we developed a coding scheme using capacity assessment content requirements, keywords (e.g., program evaluation, staffing), and type of finding (e.g., strengths, actions taken). Assessments were coded by a primary analyst and then codes were reviewed by a second analyst. Analysts reached consensus on codes through discussion. We then queried and analyzed the results, using professional judgment to identify common themes. Our coding scheme captured findings in six broad topics listed above. Within each topic, we identified when multiple agencies identified the same or similar findings (sub-themes). We further identified that many of those sub-themes shared commonalities (e.g., each related to a strength) and could be further grouped together as a theme (e.g., strengths). We did not corroborate or verify the accuracy of agencies’ capacity assessment findings.

³One of the twelve themes—opportunities to strengthen policies, practices, and organizational structures to enhance independence—involved seven agencies. Each theme related to strengths or opportunities is comprised of one to five sub-themes, which we also identify in the tables that follow.

Appendix II: Capacity Assessment Themes by Agency

Table 1: Agency-Reported Strengths Related to Existing Capacity in Capacity Assessments

Agencies	Strength sub-themes (21 agencies)		
	Had staff with the necessary knowledge, skills, and abilities	Had access to appropriate tools to collect, analyze, and use data and information	Leveraged third parties to support evidence-building activities
Department of Agriculture			X
Commerce	X		X
Education	X		X
Energy	X		
Health and Human Services	X	X	X
Homeland Security	X	X	X
Housing and Urban Development	X		X
Justice	X	X	X
Labor	X	X	X
State			X
Transportation	X	X	X
the Treasury	X		
Veterans Affairs		X	X
Environmental Protection Agency			X
National Aeronautics and Space Administration	X		X
National Science Foundation	X	X	X
Nuclear Regulatory Commission	X	X	X
Office of Personnel Management			X
Small Business Administration	X		X
Social Security Administration	X	X	X
U.S. Agency for International Development	X	X	X
Number of agencies	16	10	19

Source: GAO analysis of agency capacity assessments. | GAO-24-106982

Note: We identified themes and sub-themes through a structured content analysis of the capacity assessments issued by 23 agencies in 2022. An agency's inclusion or exclusion in a sub-theme is based on our analysis of agency-reported information in its capacity assessment. We did not corroborate or verify the accuracy of agencies' capacity assessment findings. Sub-themes relate to one or more source of evidence (i.e., those covered in capacity assessments: statistics, evaluation, research, and analysis). We defined capacity assessment findings as "strengths" when agencies reported having capacity, policies, or processes to effectively build and use evidence.

Appendix II: Capacity Assessment Themes by Agency

Table 2: Agency-Reported Opportunities to Enhance Capacity in Capacity Assessments

Agencies	Opportunity sub-themes (21 agencies)				
	Hire additional staff with the necessary knowledge, skills, and abilities	Provide additional training to existing staff to strengthen skill sets	Acquire additional or enhanced tools to collect, analyze, and use data and information	Create or use existing collaborative mechanisms	Make additional budgetary resources available
Department of Agriculture		X	X	X	
Education	X		X	X	X
Health and Human Services	X		X	X	
Homeland Security	X	X	X	X	X
Housing and Urban Development	X	X	X		
the Interior	X				X
Justice	X	X	X	X	X
Labor	X	X	X		
State	X	X	X	X	X
Transportation	X	X		X	
the Treasury	X	X	X	X	
Veterans Affairs	X	X	X	X	
Environmental Protection Agency	X	X		X	
General Services Administration	X		X	X	
National Aeronautics and Space Administration				X	
National Science Foundation	X	X	X		
Nuclear Regulatory Commission	X	X	X		
Office of Personnel Management	X	X		X	
Small Business Administration		X	X	X	
Social Security Administration		X			
U.S. Agency for International Development		X	X	X	
Number of agencies	16	16	15	15	5

Source: GAO analysis of agency capacity assessments. | GAO-24-106982

Note: We identified themes and sub-themes through a structured content analysis of the capacity assessments issued by 23 agencies in 2022. An agency's inclusion or exclusion in a sub-theme is based on our analysis of agency-reported information in its capacity assessment. We did not corroborate or verify the accuracy of agencies' capacity assessment findings. Sub-themes relate to one or more source of evidence (i.e., those covered in capacity assessments: statistics, evaluation, research, and analysis). We defined capacity assessment findings as "opportunities" when agencies reported ways to enhance their ability to effectively build and use evidence.

Appendix II: Capacity Assessment Themes by Agency

Table 3: Agency-Reported Coverage of Evidence-Building Activities in Capacity Assessments

Agencies	Themes	
	Described organization of their evidence-building activities (17 agencies)	Identified evidence-building activities (21 agencies)
Department of Agriculture	X	X
Commerce		X
Education	X	X
Energy		X
Health and Human Services		X
Homeland Security	X	X
Housing and Urban Development	X	
the Interior	X	X
Justice	X	
Labor	X	X
State	X	X
Transportation	X	X
the Treasury	X	X
Veterans Affairs	X	X
Environmental Protection Agency		X
General Services Administration		X
National Aeronautics and Space Administration	X	X
National Science Foundation	X	X
Nuclear Regulatory Commission	X	X
Office of Personnel Management		X
Small Business Administration	X	X
Social Security Administration	X	X
U.S. Agency for International Development	X	X
Number of agencies	17	21

Source: GAO analysis of agency capacity assessments. | GAO-24-106982

Note: We identified themes through a structured content analysis of the capacity assessments issued by 23 agencies in 2022. An agency's inclusion or exclusion in a theme is based on our analysis of agency-reported information in its capacity assessment. We did not corroborate or verify the accuracy of agencies' capacity assessment findings.

Appendix II: Capacity Assessment Themes by Agency

Table 4: Agency-Reported Strengths and Opportunities to Enhance Quality in Capacity Assessments

Agencies	Themes			
	Strengths (17 agencies)		Opportunities (16 agencies)	
	Sub-themes			
	Followed policies and guidance	Leveraged internal and external expertise	Enhance policies and practices	Standardize evidence-building activities or tools
Department of Agriculture	X		X	X
Commerce	X			
Education	X			
Health and Human Services	X	X		
Homeland Security	X	X	X	
Housing and Urban Development	X	X		X
Justice		X	X	X
Labor	X	X	X	X
State				X
Transportation	X	X	X	
the Treasury			X	
Veterans Affairs		X	X	
Environmental Protection Agency	X		X	
General Services Administration			X	
National Aeronautics and Space Administration	X	X		
National Science Foundation	X		X	
Nuclear Regulatory Commission			X	
Office of Personnel Management	X			
Small Business Administration	X		X	
Social Security Administration	X	X	X	
U.S. Agency for International Development	X	X	X	
Number of agencies	15	10	14	5

Source: GAO analysis of agency capacity assessments. | GAO-24-106982

Note: We identified themes and sub-themes through a structured content analysis of the capacity assessments issued by 23 agencies in 2022. An agency’s inclusion or exclusion in a theme or sub-theme is based on our analysis of agency-reported information in its capacity assessment. We did not corroborate or verify the accuracy of agencies’ capacity assessment findings. Sub-themes relate to one or more source of evidence (i.e., those covered in capacity assessments: statistics, evaluation, research, and analysis). We defined capacity assessment findings as “strengths” when agencies reported having capacity, policies, or processes to effectively build and use evidence. We defined capacity assessment findings as “opportunities” when agencies reported ways to enhance their ability to effectively build and use evidence.

Appendix II: Capacity Assessment Themes by Agency

Table 5: Agency-Reported Strengths and Opportunities to Enhance Methods in Capacity Assessments

Agencies	Themes			
	Strengths (16 agencies)		Opportunities (13 agencies)	
	Sub-themes			
	Followed policies and guidance	Leveraged internal and external expertise	Enhance data or evaluation methodologies	Enhance capacity and awareness of different sources of evidence and methods
Department of Agriculture	X	X	X	X
Commerce	X	X		
Education	X	X	X	
Energy			X	
Health and Human Services	X	X		
Homeland Security		X	X	X
Housing and Urban Development	X	X	X	
the Interior			X	X
Justice		X	X	X
State		X	X	
Transportation	X		X	
the Treasury			X	
Veterans Affairs		X		
National Aeronautics and Space Administration	X	X		
National Science Foundation				X
Nuclear Regulatory Commission	X			X
Office of Personnel Management		X		X
Small Business Administration	X			
Social Security Administration		X		
U.S. Agency for International Development	X	X		
Number of agencies	10	13	10	7

Source: GAO analysis of agency capacity assessments. | GAO-24-106982

Note: We identified themes and sub-themes through a structured content analysis of the capacity assessments issued by 23 agencies in 2022. An agency’s inclusion or exclusion in a theme or sub-theme is based on our analysis of agency-reported information in its capacity assessment. We did not corroborate or verify the accuracy of agencies’ capacity assessment findings. Sub-themes relate to one or more source of evidence (i.e., those covered in capacity assessments: statistics, evaluation, research, and analysis). We defined capacity assessment findings as “strengths” when agencies reported having capacity, policies, or processes to effectively build and use evidence. We defined capacity assessment findings as “opportunities” when agencies reported ways to enhance their ability to effectively build and use evidence.

Appendix II: Capacity Assessment Themes by Agency

Table 6: Agency-Reported Strengths and Opportunities to Enhance Effectiveness in Capacity Assessments

Agencies	Themes			
	Strengths (19 agencies)		Opportunities (20 agencies)	
	Sub-themes			
	Built evidence to meet identified needs of decision-makers	Used evidence in decision-making processes	Prioritizing building new evidence to meet decision-maker and stakeholder needs	Better disseminating evidence
Department of Agriculture			X	
Commerce		X		X
Education	X	X	X	
Health and Human Services	X	X	X	
Homeland Security	X	X	X	X
Housing and Urban Development	X	X	X	X
the Interior		X		
Justice			X	X
Labor		X	X	X
State			X	X
Transportation	X	X	X	X
the Treasury	X	X		
Veterans Affairs	X	X	X	
Environmental Protection Agency		X	X	
General Services Administration		X		X
National Aeronautics and Space Administration	X	X		X
National Science Foundation	X			X
Nuclear Regulatory Commission		X	X	
Office of Personnel Management	X		X	X
Small Business Administration		X	X	X
Social Security Administration	X	X	X	X
U.S. Agency for International Development	X	X	X	X
Number of agencies	12	17	16	14

Source: GAO analysis of agency capacity assessments. | GAO-24-106982

Note: We identified themes and sub-themes through a structured content analysis of the capacity assessments issued by 23 agencies in 2022. An agency's inclusion or exclusion in a theme or sub-theme is based on our analysis of agency-reported information in its capacity assessment. We did not corroborate or verify the accuracy of agencies' capacity assessment findings. Sub-themes relate to one or more source of evidence (i.e., those covered in capacity assessments: statistics, evaluation, research, and analysis). We defined capacity assessment findings as "strengths" when agencies

Appendix II: Capacity Assessment Themes by Agency

reported having capacity, policies, or processes to effectively build and use evidence. We defined capacity assessment findings as “opportunities” when agencies reported ways to enhance their ability to effectively build and use evidence.

Table 7: Agency-Reported Strengths and Opportunities to Enhance Independence in Capacity Assessments

Agencies	Themes		
	Strengths (13 agencies)		Opportunities (7 agencies)
	Sub-themes		
	Followed policies and guidance	Functional separation of certain evidence-building activities	Strengthen policies, practices, and organizational structures
Department of Agriculture			X
Commerce	X		
Health and Human Services	X	X	
Homeland Security	X		X
Housing and Urban Development	X	X	
State	X		
Transportation	X		X
the Treasury	X		X
Veterans Affairs	X		X
National Aeronautics and Space Administration	X		
National Science Foundation	X		
Nuclear Regulatory Commission			X
Office of Personnel Management			X
Small Business Administration	X		
Social Security Administration	X	X	
U.S. Agency for International Development	X	X	
Number of agencies	13	4	7

Source: GAO analysis of agency capacity assessments. | GAO-24-106982

Note: We identified themes and sub-themes through a structured content analysis of the capacity assessments issued by 23 agencies in 2022. An agency’s inclusion or exclusion in a theme or sub-theme is based on our analysis of agency-reported information in its capacity assessment. We did not corroborate or verify the accuracy of agencies’ capacity assessment findings. Sub-themes relate to one or more source of evidence (i.e., those covered in capacity assessments: statistics, evaluation, research, and analysis). We defined capacity assessment findings as “strengths” when agencies reported having capacity, policies, or processes to effectively build and use evidence. We defined capacity assessment findings as “opportunities” when agencies reported ways to enhance their ability to effectively build and use evidence.

Appendix III: Comments from the Office of Management and Budget



EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

August 1, 2024

Dawn G. Locke
Director, Strategic Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Director Locke:

The Office of Management and Budget (OMB) appreciates the opportunity to review the Government Accountability Office's (GAO) draft report, "Evidence-Based Policymaking – Agencies Need Additional Guidance to Assess Their Capacity" (GAO-24-106982), which seeks to document findings and trends in agencies' capacity assessments under the Evidence Act.

OMB appreciates GAO's attention to the Evidence Act's requirement for agency capacity assessments and acknowledges GAO's recommendations. OMB neither agrees nor disagrees with the recommendations and will take them into consideration during future engagements with the Evaluation Officer Council. OMB notes that a number of steps already in progress will well equip agencies to develop their next capacity assessments, while also making use of the information and learning gained from their previous assessments. OMB intends to continue leveraging the Evaluation Officer Council as a forum for sharing leading practices and methods, including those related to the capacity assessment, among agency peers.

GAO's report accurately reflects that OMB has done this successfully to date: officials from 21 agencies told GAO that information-sharing during Council meetings and other support from OMB has helped inform their development of capacity assessments. OMB has also provided agencies with additional support for the capacity assessment through workshops and trainings available for all Executive Branch staff, with recordings and materials available on a Government MAX.gov page, as well as an explanation of statutory terms and definitions related to capacity assessments in OMB Circular A-11, Section 290.

OMB's approach to providing agencies with flexibility to design and conduct the capacity assessment allows the assessment to be a useful tool that can meet agencies' specific needs, rather than serving as a compliance exercise for OMB's benefit. In its role leading the Evaluation Officer Council, OMB believes that Evaluation Officer Council meetings have provided agencies with a critical forum to address the gaps and needs identified in their capacity assessments, including by developing and sharing practices and policies to improve their capacity for evaluation and related evidence-building activities. Reflecting the intent of the Evidence Act to improve agencies' capacity to build and use evidence, OMB and the Evaluation Officer Council have focused on responding to the results of the agency capacity assessments

**Appendix III: Comments from the Office of
Management and Budget**

published in 2021. OMB believes that using limited Council resources to improve agencies' capacity is ultimately the most important priority.

We look forward to further collaboration with GAO.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Miller", written over a light gray circular stamp.

Jason Miller
Deputy Director for Management

Appendix IV: Comments from the Department of the Treasury



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

July 31, 2024

Dawn G. Locke
Director, Strategic Issues
Government Accountability Office
441 G Street, NW
Washington, DC 20548
LockeD@gao.gov

Dear Dawn G. Locke,

Thank you for the opportunity to review and comment on Government Accountability Office (GAO) Report GAO-24-106982, "Evidence-Based Policymaking: Agencies Need Additional Guidance to Assess Their Capacity." The Department of the Treasury (Treasury) appreciates the work performed by the GAO team and while the report makes recommendations to the Office of Management and Budget (OMB), Treasury will use the report to inform our planning for the upcoming FY 2026-2030 Capacity Assessment.

Since Treasury completed the first capacity assessment in February 2022, we have made meaningful improvements to the Department's evidence-building capacity, policies, and practices by strategically investing limited resources in smart ways. The capacity assessment provided an important tool in helping us to identify and prioritize these investments. The publication of this GAO report presents an opportunity to highlight our accomplishments as we continue to advocate to Congress for deeper investments in Evidence Act implementation and begin our preparations for conducting the next capacity assessment.

GAO Challenge: Working within time and resource constraints (p.28)

GAO identified that agency officials said they faced challenges producing their capacity assessments with limited resources. The report further states that "In the Analytical Perspectives volume of the Fiscal Year 2024 Budget of the U.S. Government, OMB noted that the proposed budget ensured all major agencies had some dedicated evaluation staff to support the Evaluation Officer. In our interviews with agency officials in January and February 2024, they told us that their agencies now have more staff supporting this function."

Treasury continues to seek the resources for a small central evidence team at the agency headquarters level bolstered by deep program evaluation and research benches within each Treasury bureau. This model will optimize evidence-building capacity by enabling the small central team to effectively coordinate Department-wide evidence building activities, form partnerships, provide technical assistance, and directly conduct cross-cutting/high-priority evaluations while the bureaus build deep expertise and capacity closer to the operations and mission. In the FY 2023, FY 2024, and FY 2025 President's Budgets, we advocated for the resources to support this vision.

While some of the bureau requests have been subsequently funded by Congress, the central team resources have not yet received new funding. We therefore made the difficult choice to realign internal positions. Although this demonstrates our commitment to building agency capacity, the team remains below the Evaluation Officer Council (EOC) recommendation¹ that agencies' evaluation planning and reporting functions be staffed with a minimum of five (5) FTE (an agency Evaluation Officer, or EO, and four analysts/evaluators). We will need new investments to achieve our vision and fully address this challenge.

¹ June 2024 Memorandum to OMB from the Evaluation Officer Council's Resource and Capacity Working Group on Recommendations to Improve the Government's Capacity to Build and Use Evidence

Appendix IV: Comments from the Department of the Treasury



DEPARTMENT OF THE TREASURY

WASHINGTON, D.C.

Assessment Topic – Capacity (Table 1): Does the agency have the staff and tools it needs to collect, analyze, and use evidence?

When we completed the capacity assessment in February 2022, Treasury did not (at an enterprise level) leverage third parties to support evidence building activities, as indicated in the table. Since that time, Treasury has built our capacity to leverage third parties to supplement our limited in-house evidence-building capacity. We have particularly focused on strengthening our use of our Federally Funded Research and Development Center (FFRDC), which is MITRE's Center for Enterprise Modernization. Another example includes partnering with the GSA Office of Evaluation Sciences (OES) to conduct five evaluations that supported Treasury's response to executive orders and OMB implementation guidance for major new legislative programs. Finally, Treasury is now leveraging the Evidence Portal to engage with third-party resources (e.g., academic, external researchers). In 2024, Treasury opened two portal opportunities, resulting in Memorandums of Understanding with researchers to answer Learning Agenda questions.

Assessment Topic – Methods (Table 5): What are the methods being used for these activities, do these methods incorporate the necessary level of rigor, and are those methods appropriate for the activities to which they are being applied? AND Assessment Topic – Independence (Table 7): To what extent are the activities being carried out free from bias and inappropriate influence?

When we completed the capacity assessment in February 2022, Treasury did not have in place an agency policy or standards regarding evidence-building activities, including program evaluations. Consequently, strengthening our policies, practices, and organizational structures became a key priority for improving our evidence-building capacity. Since the capacity assessment was conducted, Treasury has taken steps to revise its Evidence and Evaluation Policy. The Evaluation Officer is partnering with the Statistical Official, Chief Data Officer, and bureau and policy office evaluators to revise its Evidence and Evaluation Policy. The revised policy is expected to be finalized in 2024. We are also finalizing policies related to broader strategic management and program/project management that reinforce principles of evidence use.

Further, Treasury developed and is finalizing its Treasury Directive 12-80 Scientific Integrity Policy. The purpose of the policy is to provide instruction to enhance and promote a continuing culture of scientific integrity within Treasury and ensure the integrity of all aspects of scientific activities within Treasury. The policy is expected to be published by September 2024.

Thank you again for your timely work in summarizing the key strengths and opportunities identified government-wide during the last capacity assessment, and for the opportunity to review and comment. We look forward to partnering with OMB and the Evaluation Officer Council as we continue to improve our evidence-building capacity and expect this report will be a valuable resource as we conduct our second capacity assessment in the coming year.

Respectfully,

Lenora J. Stiles

Digitally signed by Lenora J. Stiles
Date: 2024.08.02 10:07:03 -04'00'

Lenora Stiles
Deputy Assistant Secretary for Strategy, Planning, and Performance Improvement
U.S. Department of the Treasury

Appendix V: Comments from the Nuclear Regulatory Commission



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 30, 2024

Dawn G. Locke
Director, Strategic Issues
U.S. Government Accountability Office
441 G Street, N.W.
Washington, DC 20548

SUBJECT: GAO DRAFT REPORT: EVIDENCE-BASED POLICYMAKING: AGENCIES
NEED ADDITIONAL GUIDANCE TO ASSESS THEIR CAPABILITY
(GAO-24-106982)

Dear Ms. Locke:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your request for comments on the U.S. Government Accountability Office draft report GAO-24-106982, "Evidence-based Policymaking: Agencies Need Additional Guidance to Assess Their Capacity." As requested, the NRC has reviewed the draft report and has no comment.

If you have any questions regarding this response, please contact John Jolicoeur. Mr. Jolicoeur can be reached at 301-415-1642 or by e-mail to John.Jolicoeur@nrc.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mirela Gavrilas".

Signed by Gavrilas, Mirela
on 07/30/24

Mirela Gavrilas
Executive Director for Operations

Appendix VI: Comments from the Social Security Administration



SOCIAL SECURITY
Office of the Commissioner

July 26, 2024

Dawn G. Locke
Director, Strategic Issues
United States Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Director Locke,

Thank you for the opportunity to review the Draft Report, "EVIDENCE-BASED POLICYMAKING: Agencies Need Additional Guidance to Assess Their Capacity" (GAO-24-106982). We have no comments.

Please contact me at (410) 965-2611 if I can be of further assistance. Your staff may contact Hank Amato, Director of the Audit Liaison Staff, at (407) 765-9774.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dustin Brown".

Dustin Brown
Acting Chief of Staff

Appendix VII: Comments from the U.S. Agency for International Development



July 31, 2024

Dawn Locke
Director, Strategic Issues
U.S. Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20226

Re: Evidence-based Policymaking: Agencies Need Additional Guidance to Assess Their Capacity (GAO-24-106982)

Dear Ms Locke:

This letter serves as the formal response of the U.S. Agency for International Development (USAID) to the draft report produced by the U.S. Government Accountability Office (GAO) titled, Evidence-based Policymaking: Agencies Need Additional Guidance to Assess Their Capacity, (GAO-24-106982). This report does not contain any recommendations for action on behalf of USAID. USAID would like to thank GAO for the opportunity to review this draft report. We sincerely appreciate the extensive work of the GAO engagement team.

The report highlights strengths, as well as opportunities for agencies to enhance their ability to effectively build and use evidence. In addition, the draft report also provided, as an example, USAID's approach to ensuring independence of program evaluation, by, for example, having evaluations conducted by a third-party evaluation team external to USAID and to the partner implementing the program under evaluation. As USAID seeks to maximize the effectiveness of our programs, we look forward to continuously strengthening our capacity to generate and use quality evidence in our decision-making.

I am transmitting this letter for inclusion in the final GAO report. Thank you for the courtesies extended by your staff while conducting this engagement. We are grateful for the opportunity to participate in GAO engagement and guidance on the Agency Evidence-Building Capacity Assessments.

Sincerely,

Colleen Allen

Colleen Allen
Assistant Administrator
Bureau for Management

Appendix VIII: GAO Contact and Staff Acknowledgments

GAO Contact

Dawn G. Locke, (202) 512-6806 or LockeD@gao.gov

Staff Acknowledgments

In addition to the above contact, Benjamin T. Licht (Assistant Director), Shelby Kain (Analyst-in-Charge), Michael Bechetti, Brett Caloia, Valerie Caracelli, Robert Gebhart, Terrell Lasane, Alexia Lipman, Rebecca Sero, and Andrew J. Stephens made significant contributions to this report.

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