Response to Request for Comments for the Commission on Evidence-Based Policymaking

December 2, 2016

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Introduction
On behalf of Child Trends, a nonpartisan, nonprofit research organization focused exclusively on improving the lives and prospects of children, youth, and their families, we would like to extend our thanks to the Commission on Evidence-Based Policymaking and its Commissioners. We appreciate their attention to such an important issue and the opportunity to participate in that conversation. We are pleased to see and hear so much support for developing and supporting evidence-based policymaking in the Commission’s meetings and hearings and look forward to reviewing the resulting report in 2017.

Child Trends brings 37 years of experience conducting research about children, families, and the programs that serve them. A major component of our work involves building an evidence base around “what works” for our most vulnerable children and families. Our staff of over 120 researchers brings a wealth of methodological experiences that we draw from for these comments: from implementation studies, to conducting multi-year randomized-controlled trials, to technical assistance for state and non-profit leaders, to linking and analyzing state administrative data, to incorporating big data in our analyses.

With this experience in mind, today we provide responses to questions 7, 10, 15, and 16, the questions that are most relevant to our daily work. We would be happy to provide additional details or submit answers to other questions if it would be helpful to the Commission.
7. What data should be included in a potential U.S. government data clearinghouse(s)? What are the current legal or administrative barriers to including such data in a clearinghouse or linking the data?

To have a comprehensive federal data clearinghouse, it is essential to incorporate available data on children and families. In 2016, the federal government will spend $309 billion on children. This constitutes a significant investment in the public’s money and supports a broad range of programs and services for families to support their health, education, nutrition, and other needs. Although a significant investment, the need is also great. Policymakers require high-quality and timely data to ensure that funds are used in an efficient manner, and that as many children as possible receive the services that will yield the best possible outcomes. To provide policymakers with the type of rich information they need to make decisions, data must be readily available and regularly analyzed.

Creating a federal clearinghouse of data would overcome one of the major obstacles that researchers and policymakers face now in using federal data: the "siloed" nature of data. Currently, data are housed in different agencies or warehouses by program or information on one family is located in several different data systems. Without access to multiple datasets, we can only tell a limited story about children and families – the story of their involvement in a particular program or service. For example, we may know much about the numbers, demographics, and service utilization of children in the child welfare system. However, without linking to other data, we cannot know if one family receives duplicate services, or if families access multiple programs. We also cannot link service receipt to long term outcomes in other areas such as education or justice. We are unable to paint a clear picture of what is happening to families in a single system or how to most efficiently and effectively serve them.

Much work must be done to ensure that the data in the federal clearinghouse is as useful as possible. From our work, we specifically recommend the Commission consider the following:

- **Establish guidelines to ensure data quality** so that researchers, policymakers and the public have confidence in the information gleaned from the clearinghouse. This includes making sure all those who enter the data are consistently defining data terms across states and communities and that data is collected in a timely manner. To achieve such high standards, states may need additional support and technical assistance to understand new requirement or terms.

- **Invest in training** to ensure a federal workforce is skilled in data analysis. Establish partnerships among federal and state agencies, universities, and researchers so that the data in the clearinghouse is fully used. Simply having the data will not be enough to inform policymaking. Data must be analyzed and incorporated into evaluations so that the information can better inform decision making.

- **Support convenings of various stakeholders to discuss how best to translate the research** into understandable and actionable information to shape decisions on programs and services. To provide raw numbers or technical analysis is not enough.

- **Identify and establish ways to link state and federal data** to maximize utility of the data. Currently the federal government holds only a fraction of the data on services and participants in services. A large portion of data needed to get a full picture of service provision

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and participant outcomes for federally-funded programs are collected by state agencies. A federal-level data clearinghouse would need to either include state-held data or facilitate linkages between federal and state data to understand program outcomes. We recommend the latter. The Commission could make a recommendation on standardizing Memoranda of Understanding across state and federal agencies to share data, providing secure methods of linking data across datasets irrespective of whether they are federal or state, and having a shared data governance structure over administrative data held by the federal or state governments.

10. How should the Commission define “qualified researchers and institutions?” To what extent should administrative and survey data held by government agencies be made available to “qualified researchers and institutions’’?

We recommend the Commission make federal administrative and survey data available to external researchers. The research community is broad. It includes universities, think tanks, professional research organizations, and other groups. Over the years, Child Trends and other independent organizations have interpreted various government datasets to shine a light on issues of importance to children and families. Our work, like that of others organizations, has long been valued by policymakers at all levels of government and across the political spectrum. This work has expanded the knowledge on evidence-based programs serving children and youth in areas such as child welfare, teen pregnancy prevention, bullying prevention, and poverty reduction.

External research organizations can provide a level of independence to the analyses and interpretation of the results that lends credibility to the findings.

15. What barriers currently exist for using survey and administrative data to support program management and/or evaluation activities?

As discussed above in our response to question 7, data quality (specifically clear and consistent data definitions for data entry and data timeliness) is a barrier to using survey and administrative data for program management and/or evaluation activities. Additionally, the Commission should be aware of the following challenges:

- **Access to data**: Researchers need streamlined processes to access data, while protecting data security. Currently, access to data can be an arduous process, taking months to years. To have research that is timely enough to support policy decision-making, researchers need swift access to data to answer questions before they are moot. Strategies like those of the National Center for Education Statistics or the National Center for Health Statistics, which set up secure access to data, may be useful for the Commission to explore.

- **Siloed nature of data**: As discussed above, data is currently siloed in one system or the other and at the federal or state level. Linking or connecting data is critical to answering the types of questions we need to inform decision-making.

- **Timeliness of data/evaluation**: Evidence-based policymaking and programmatic decision-making often requires data to be available and analyzed quickly to answer questions and respond to issues on a timely basis. Currently, accessing data is not a timely or efficient process. When programs are administered by local communities, there is often a natural lag between
when data are reported to the state agency, cleaned and prepared and then reported to the federal government. This process often can take multiple years so data currently available at the federal level may be years old (e.g. Medicaid or birth records). For more timely evaluations, researchers are often faced with negotiating data sharing with each individual state, which can take 6 to 18 months to secure an agreement.

- **Dissemination of research to policymakers:** In our work partnering with states and child-serving organizations, we have learned the importance of distilling and translating research into actionable information for use in policymaking and programmatic decision-making. However, researchers are incentivized to publish in peer-reviewed journals or lack funds to make research more broadly accessible. Organizations such as Child Trends can be effective partners in disseminating knowledge to policymakers and others who are making decisions on programs and services for children and families.

16. How can data, statistics, results of research, and findings from evaluation, be best used to improve policies and programs?

Data and research must be a continuous part of policy and programmatic work. It is not as simple as conducting an evaluation at some static moment after a program gets up and running. Evaluation, research, and data are all parts of a process that begins as policymakers and community members identify a problem that needs to be addressed and continues throughout a program’s life. Though discussed below as a linear process, our experience indicates the process of integrating research and evaluation into policies and programs is iterative and overlapping. The process may begin with a needs assessment using the most up to date administrative data to identify the issues faced by a community and population that is the focus of intervention efforts. It continues through intervention identification, using research and systematic reviews to identify available effective models. Implementing organizations often develop a theory of change and a logic model based on research and implementation science. A performance management system should be developed and data regularly collected so that program inputs, outputs, and outcomes can be tracked, reported and used for monitoring progress and continuous improvement. Research and evaluation may be used at multiple points in time to inform program design and implementation. Descriptive evaluations of participant outcomes and implementation can support high-quality programs through documenting activities and outcomes. Once a program is mature, impact evaluations may occur to determine if the program as a whole or individual pieces of the program are effective. Programs are all at different stages of implementation and need different types of research and evaluation support to guide evidence in their decision-making.

Research on the use of evidence in policymaking suggests leadership and staff use people and organizations they trust to learn about relevant research. Without trust and ongoing partnership, research often goes unused. Ongoing research-to-practice partnerships are one tool to ensure research and evaluation remains relevant, timely, and integrated to policy and practice.

The work of the Commission is exciting and has the potential to advance the adoption of evidence-based policymaking. To maximize these investments we hope the Commission will make sure data is fully accessible and available on a timely basis; fund training to improve data analysis and expertise among stakeholders; and encourage partnerships to ensure the wide application of the data to improve the efficiency and effectiveness of all government services and programs.
Conclusion
We would be happy to provide further information on any of these recommendations or address specific questions. Please feel free to contact: Elizabeth Jordan, senior policy analyst, Child Trends at ejordan@childtrends.org or 202-520-9090.