Date:	November 22, 2016
Attn:	Shelly Martinez
	Executive Director of the Commission on Evidence-Based Policymaking
Cc:	Nick Hart, Policy and Research Director for the Commission on Evidence-Based
	Policymaking
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Re:	Docket ID USBC-2016-0003
	Commission on Evidence-Based Policymaking Comments
Submitted by:	The Local Initiatives Support Corporation (LISC)

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Thank you for the opportunity to offer comments on the future activities and scope of work to be undertaken by the Commission on Evidence-Based Policymaking. The Local Initiatives Support Corporation (LISC) views this as an opportunity to positively influence how data is used to improve outcomes for communities with persistent economic and social challenges. We hope that LISC's comments – which are informed by our experience in funding and facilitating the collaborative efforts of local constituencies and the public and private sectors – will be useful to the Commission.

ABOUT LISC
Established in 1979, the Local Initiatives Support Corporation (LISC) is a national nonprofit and Community Development Financial Institution (CDFI) dedicated to helping community residents transform distressed neighborhoods into healthy places of choice and opportunity – good places to work, do business and raise children. LISC mobilizes corporate, government and philanthropic support to provide local community development organizations with loans, grants and equity investments; local, statewide and national policy support; and technical and management assistance.
 LISC has local offices in 31 cities and partners with more than 70 organizations serving rural communities throughout the country. We focus our activities across strategic community revitalization goals, including: expanding investment in housing and other real estate; increasing family financial stability; stimulating economic development; improving access to quality education; and supporting healthy environments and lifestyles.

For more than three decades, LISC has developed programs and raised investment capital to help local groups revive their neighborhoods. The following feedback and recommendations are rooted in our organization's experience in collaborating with community groups to use research and data to identify the priorities and challenges of their neighborhoods, and deliver the most appropriate support to meet local needs.

FEEDBACK & RECOMMENDATIONS
LISC is pleased to offer feedback and recommendations to the following questions:

Overarching Questions
1. *Are there successful **frameworks, policies, practices, and methods** to overcome challenges related to evidence-building from state, local, and/or international governments the Commission should consider when developing findings and recommendations regarding Federal evidence-based policymaking? If so, please describe.*

CHALLENGES

As federal agencies adopt evidence-based policies to become better stewards of limited taxpayer resources and improve outcomes for communities, we encourage them to be mindful of the following challenges related to practical implementation in local neighborhoods:

Local organizations lack the capacity and financial support to develop the ability to effectively implement data-driven programming.

Many organizations serving high need neighborhoods were established to address specific challenges, and did not evolve from structured research. As such, the application of evidence-based principles to policies that govern programs targeting low-income communities is still fraught with challenges. In our experience, most local organizations have limited familiarity with collecting data, lack data system infrastructures, and do not have adequate funding to address these deficiencies – making it extremely challenging to implement and evaluate rigorous programs. If local organizations are to be successful in implementing evidence-based programs and practices, they need financial support and technical assistance to build their organizational capacity.

Investing in research summaries and the production of additional materials and trainings that aid "data translation" would help local policymakers and other leaders, many of whom might not have the resources for a significant, ongoing academic research partnership, to pursue evidence-based practices. For example, the CrimeSolutions.gov database of evidence summarizes important criminal justice research in a relatively accessible way. It could be improved through modifications to capture important findings from research studies beyond the top-level classification of whether particular strategies were successful.

Local organizations that are developing capacity take longer to show evidence of effectiveness toward achieving outcomes in communities.

We know that very few organizations serving high need communities have the technical expertise, capacity and funding to decide which data is important to collect and develop evaluations that assess effectiveness toward achieving desired outcomes. Many service providers are just beginning to shift from collecting process data to collecting data that can be used to show program effectiveness and progress for participants. Accountability measures, particularly those that might be used to limit or eliminate programmatic funding based upon progress toward achieving outcomes, need to take the limitations of local organizations making the shift to evidence-based programs into consideration. Specifically, organizations should be given a reasonable timeline to integrate data-driven practices and, if they do not meet the benchmarks associated with desired programmatic outcomes, they should be guided to adopt quality improvement measures to improve their results.

Policies that encourage the adoption and implementation of evidence-based programs often do not include sufficient support for innovative promising approaches. Promising programs and innovations should be incubated and helped along the road to becoming evidence-based.

It is encouraging to see policymakers move in the direction of ensuring that publicly supported programs achieve their intended outcomes and improve the quality of life in struggling communities. Program implementers face significant pressures to demonstrate that the approaches adopted improve participant outcomes, are cost-effective and have a return on investment. The pressure to show progress toward achieving desired programmatic outcomes coupled with unrealistic timeframes to achieve significant outcomes may inadvertently lead to abandoning programs that work, but do not yet have a robust evidence base. As previously mentioned, local program providers often lack the funding and capacity to demonstrate evidence of effectiveness. In addition to supporting replication of proven programs, it is important that federal efforts promote and incubate innovation, and allow sufficient time for demonstration of outcomes.

Evidence-based policies and community-oriented / community-driven decision-making are often mistakenly perceived as mutually exclusive.
We have observed that some policymakers view evidence-based decision-making and community-oriented or community-driven decision-making as mutually exclusive. There is a flawed assumption that evidence-based decisions happen when policymakers gather with experts behind closed doors to parse significant amounts of research and emerge with policy decisions; in community-oriented processes, residents are invited to participate in setting priorities based wholly on their own perceptions and experience, with no consideration of evidence. We see this as a false choice that leads to important decisions being made in a top-down fashion, with smaller decisions left to superficially indulge communities.

SUCCESSFUL POLICIES

Policies that support collaboration between the public and private sectors hold great promise for addressing community need. Below are several successful programs that are instructive to efforts that seek to promote data driven investments, support innovation, and employ cross-sector partnerships.

- **Corporation for National and Community Service (CNCS) Social Innovation Fund (SIF)**
  Authorized by the Edward M. Kennedy Serve American Act of 2009, SIF catalyzes the use of data-driven approaches with evidence of effectiveness in local communities. Through an intermediary structure, the program mobilizes public and private sector resources to address local and national challenges in three priority areas: economic opportunity, healthy futures, and youth development. Since 2010, the SIF has invested $800 million in compelling community solutions, allocating more than $295 million in federal grants and leveraging more than $582 million in non-federal match commitments.

  o **The SIF Classic Program** provides awards to eligible grant making institutions or partnerships to select, fund, support, and evaluate community-based nonprofits seeking to grow innovative, evidence-based solutions in the areas of economic opportunity, healthy futures and/or youth development. SIF Classic resources are enabling LISC to grow, scale, replicate, and enhance the Financial Opportunity Center (FOC) model. FOCs provide low-income individuals with integrated services across three critical areas: employment services and career planning, financial coaching, and income supports. SIF resources enabled evaluation of the model. The research revealed that clients who accessed combined services were 50% more likely to land a well-paying job than people receiving employment services only, and that long term employment almost doubles when financial coaching reinforces the work of employment counseling.

  o **The SIF Pay for Success (PFS) Program** awards grants to eligible nonprofit organizations to leverage upfront philanthropic and private dollars to fund social service programs that demonstrate success through measurable outcomes. LISC was awarded PFS resources to help social service providers design effective programs, raise private capital and produce the metrics needed to demonstrate positive outcomes. Three to four high-quality projects in need of transaction structuring services for youth development, economic opportunity and healthy futures will be supported by the award. This program may to revolutionize the way that social services are funded and delivered.

  One challenge facing innovations funded by the SIF is identifying a pathway to integrating, scaling and expanding approaches with evidence of effectiveness in a manner that aligns with existing federal efforts to address national and local challenges. In fact, despite the SIF's widespread success, many federal agencies are unaware that SIF-supported innovations leverage significant private capital, and have the potential to help improve existing programs, yielding better outcomes for vulnerable communities. If seriously considered by federal agencies, SIF innovations have the potential to help agencies tackle pressing social and economic issues. We believe that the SIF program

evaluations, data, and experience of partner organizations are of particular value to federal agencies tasked with providing effective services in the areas of economic opportunity, healthy futures, and youth development. As the Commission builds out its priorities and scope of work, our Coalition suggests that you encourage federal agencies to adopt relevant data-driven programs/strategies with evidence of effectiveness currently supported by the Social Innovation Fund at the Corporation for National and Community Service (CNCS).

- **Department of Justice (DOJ) Byrne Criminal Justice Innovation Program (BCJI)**
  We encourage the Commission to recognize the importance of investing in action research models tied to evidence-based decision-making to address problems that are known to be shaped significantly by context. In the case of community safety programs, the social cohesion of a high crime community is known to have complex compounding factors – like crime drivers that are inextricably linked to poverty and disinvestment. The Byrne Criminal Justice Innovation (BCJI) Program recognizes that context is important, and supports the use of data to address crime contextually.

  The Byrne Criminal Justice Innovation (BCJI) Program brings together diverse partners including local law enforcement, researchers and residents to analyze crime drivers and pursue strategies that reduce crime, spur revitalization and build community-police collaboration. Administered by the Department of Justice Bureau of Justice Assistance, BCJI is part of the "Smart Suite" of programs that support partnerships between researchers and practitioners to develop data-driven and evidence-informed strategies. The Program creates a unique structure that supports the development, implementation, and evaluation of promising innovative approaches to crime reduction in areas historically plagued by persistent crime.

  BCJI is an important data driven program not only because of its support of innovative practices, but also because of the distinctive role of technical assistance (TA). The program requires cross-sector partnerships to use data and research to adopt and implement crime reduction strategies. Because the cross-sector partnerships include local community members who may have no experience with the development of research-driven programming, and researchers who have may have no experience in authentic community engagement, the technical assistance providers are essential to facilitating dialogue that leads to the adoption of a data-driven crime reduction implementation strategy. The technical assistance provider is essentially the intermediary glue that binds research and residents.

Data Infrastructure and Access
3. *Based on identified best practices and existing examples, how should existing government data infrastructure be modified to best facilitate use of and access to administrative and survey data?*

   In facilitating the use of and access to administrative and survey data, we believe that existing government data infrastructure should consider the implications for individuals who are very transient or are victims of identity theft. Assumptions about using information like address or birth date to link individuals' records across datasets may be less applicable to some populations.

4. *What data-sharing infrastructure should be used to facilitate data merging, linking, and access for research, evaluation, and analysis purposes?*
   The Data-Driven Justice Initiative (DDJ) and similar efforts that seek to support local governments in sharing data for broader public use may prove instructive regarding the facilitation of data merging. DDJ was launched with a bipartisan coalition of 67 city, county, and state governments committed to using data-driven strategies to divert low-level offenders with mental illness out of the criminal justice system and change approaches to pre-trial incarceration, so that low-risk offenders no longer stay in jail simply because they cannot

afford a bond. The initiative brings data together from across criminal justice and health systems to identify the individuals with the highest number of contacts with police, ambulance, emergency departments, and other services, and link them to health, behavioral health, and social services in the community, with a goal of reducing overreliance on emergency healthcare and encounters with the criminal justice system.

5. *What challenges currently exist in linking state and local data to federal data? Are there successful instances where these challenges have been addressed?*
Many of the challenges that exist in linking state and local data to federal data also exist in trying to link similar data across federal agencies. Challenges exist in the following areas:
   - In some cases, data collection efforts for programs serving the same individuals either overlap or are duplicative. Local programs may have to collect the same data points on the same participants but enter that data into different platforms because of disjointed data collection requirements across agencies and programs.
   - Similar terms are defined differently because different levels of government and agencies have different objectives for the use of data.

11. *How might integration of administrative and survey data in a clearinghouse affect the risk of unintentional or unauthorized access or release of personally-identifiable information, confidential business information, or other identifiable records? How can identifiable information be best protected to ensure the privacy and confidentiality of individual or business data in a clearinghouse?*
One strategy to protect identifiable information to ensure the privacy of individual or business data is to amend the Common Rule governing the mandate and invocation of Institutional Review Boards (IRBs) and to be more diligent about privacy impact in the context of use of clearinghouse (or all administrative/survey) data.

14. *What incentives may best facilitate interagency sharing of information to improve programmatic effectiveness and enhance data accuracy and comprehensiveness?*
We are pleased that the Commission has an interest in improving interagency sharing of best practices. The Commission should consider the sharing of information and the use of information to improve programmatic effectiveness as two related, but distinct objectives. For example, agencies may currently be utilizing platforms for sharing research and data of innovations, but the shared information may only be targeting research divisions of agencies, which often exist in silos, separate from staff responsible for programmatic implementation. As such, interagency sharing improvements should not only improve the platform used for information sharing, but also influence the way that research divisions of agencies communicate with an influence programmatic divisions.

An incentive program for the adoption of shared information in an effort to improve programs may be useful in encouraging agencies to pilot or integrate innovations. Incentives could include additional funding or special national recognition from the White House.

Data Use in Program Design, Management, Research, Evaluation, and Analysis
15. *What barriers currently exist for using survey and administrative data to support program management and/or evaluation activities?*
Often, survey and administrative data is not used to support program management or evaluation activities at the local level because providers have funding limitations (most programs do not have enough operating capital to meet the needs of their communities, much less to purchase data systems), and lack the capacity to make decisions about research.

As a national intermediary that works in very specific cities & neighborhoods, we perceive several specific challenges.
- Survey data is generally not available at the small neighborhood-level geographies where we actually implement our work - results are only significant at city/state/metro/national level depending on the dataset.

- Administrative data, is more likely to be available for small geographies but is often not consistent or reconcilable across geographies. For example, it may be feasible to use administrative data for a study that is taking place only in Chicago, but it becomes harder to find & access parallel data for multiple cities at once.

16. *How can data, statistics, results of research, and findings from evaluation, be best used to improve policies and programs?*
Data, statistics, the results of research and evaluation findings should be used to improve policies and programs, but programs should also be allowed to innovate on the ground in order to adapt to and address environmental circumstances. The heavy emphasis on experimental and quasi-experimental designs make it much more difficult to use evidence to inform programs, because of the lengthy time horizons for those studies and because they require a rigid "lock-in" of program design/model in order to draw conclusions about design features. Prioritizing experimental findings actually decreases the chance that evaluation will be useful on the ground for program design – or that utility will come at a much slower pace.

19. *To what extent should evaluations specifically with either experimental (sometimes referred to as "randomized control trials") or quasi-experimental designs be institutionalized in programs? What specific examples demonstrate where such institutionalization has been successful and what best practices exist for doing so?*
From LISC's perspective, institutionalizing evaluations within programs would likely prove costly and siphon program time and energy from actual program delivery. Even if data collection is always in place for the treatment group, programs will have to incur the cost of finding a reasonable comparison group and implementing data collection. For example, in the social impact bond and Pay For Success context, results of the embedded experimental evaluation provide the basis for valuation of returns to the capital investor. This structuring is accompanied by large transaction costs.

Using experimental or quasi-experimental designs as the standard for evidence based policy rules out interventions that work at a unit of analysis that are too big for reasonable control groups to be assembled given standard statistical assumptions. If the impact is projected for individuals, then experimental designs make sense. If the impact is happening at the neighborhood level, which is the case of a lot of LISC's investments, then the logic of experimental or quasi-experimental design is much less applicable.

CLOSING
Thank you for the opportunity to weigh in on these important issues. Please contact Nicole Barcliff, Sr. Policy Officer at nbarcliff@lisc.org or (202) 739-9296 if you have any questions or if LISC can serve as a resource to the Commission.