

February 17, 2023

RE: Proposed Update to the CDC Framework for Program Evaluation in Public Health

Dr. Kidder –

The Data Foundation is a non-profit organization that seeks to improve government and society by using data to inform public policymaking. Our Data Coalition is America's premier voice on data policy, advocating for responsible policies to make government data high-quality, accessible, and usable. Together we have extensive expertise in the field of evaluation, and offer this comment to support the Centers for Disease Control's (CDC) proposed update to the evaluation framework. These comments are submitted on behalf of our organization's many stakeholders, partners, and expert contributors.

As an organization devoted to the principles of evidence-informed decision-making, the Data Foundation appreciates the CDC's continued focus on ensuring that high-quality program evaluation is a cornerstone of its work. The Data Foundation applauds the wide-reaching and long-standing impact of the Program Evaluation Framework and supports the CDC's efforts to ensure it accurately reflects developments in the evaluation field since its initial development. Particularly, the Data Foundation and our coalition members appreciate the interest for how the framework can promote culturally-responsive evaluation and improve health equity. Notably, the Data Foundation recognizes the critical importance of using data in evaluating impacts of programs, policies, and systemic inequities – aligning with and therefore realizing one of our organization's core values to use data to achieve more equitable opportunities and outcomes.

Broadly, including guidance related to equitable data collection and promoting open access to published evaluations can facilitate more equitable program evaluation. Guidance or standards for collecting demographic data can help establish consistency among public health evaluations and enable robust comparisons. Completeness of demographic data can help evaluators better understand program implications as well as aid others interested in using the evaluations in the future. Open access to evaluation products will also promote health equity, aligning with another core value we promote – transparency. Expanding access to evaluations and their underlying data in a secure way enables researchers, other evaluators, communities, decisionmakers, or other interested stakeholders to have a more complete understanding of existing evidence and develop informed policies or programs. Emphasizing the need for freely available and publicly-accessible dissemination can help make evaluations more useful, as well as equitable.

More specifically to the framework, there are various ways to ensure equity is considered throughout the steps of an evaluation. The CDC could add equity as a standard or substandard of the framework; this would emphasize equity as a pillar to be considered throughout each step in the framework and in applying evaluation standards and practices. Additionally, the CDC

could consider expanding its description of stakeholder engagement to explicitly include equitable engagement methods. Evidence generated from evaluations should be useful for those contributing the data – engaging with the community impacted by the program at every step of the evaluation will help ensure the evaluation is ultimately useful and encourage use.

Collecting, analyzing, and using data in a culturally responsive way can ensure the evidence is responsive and reflective of cultural differences. Though much of the framework reflects current program evaluation steps and standards, there has been much progress and thought leadership around culturally responsive evaluation (CRE) and multicultural validity in recent years since the framework was initially published. Incorporating recent developments will better situation the CDC to adapt the framework for contemporaneous evaluation practice and in diverse settings. Updating the framework to reflect best practices and incorporate data collection methods to measure inequities will be important to understand how programs are working or reveal impacts that may not otherwise be accounted for.

Thank you for the opportunity to provide comments on the CDC's program evaluation framework. Again, the strong framework provides an incredible foundation for the community to build on – and the comments included here are intended to continue strengthening this foundation. Our entire community through the Data Foundation and our Data Coalition members appreciate the CDC's efforts to ensure effective program evaluation and equitable data-informed decision-making. We also applaud the CDC's efforts to engage with the evaluation community and stakeholders in updating the framework. We look forward to continuing to support a robust evaluation function at the CDC and are happy to be a resource as the updates to the framework and other activities proceed in the months and year ahead.

Regards,

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President & CEO
Data Foundation