

GENERAL SERVICES ADMINISTRATION
Washington, DC 20405

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GSA ORDER

SUBJECT: GSA Evaluation Policy

1. Purpose. This Order establishes the General Services Administration's (GSA) Evaluation Policy.
2. Background. The Office of Management and Budget (OMB) Memorandum, OMB M-19-23, requires the Chief Financial Officer (CFO) Act agencies and the designated Evaluation Officers (EOs) to "establish and implement ... an agency evaluation policy that affirms the agency's commitment to conducting rigorous, relevant evaluations and to using evidence from evaluations to inform policy and practice. The policy will provide the agency's stakeholders with a clear understanding of the expectations related to key principles, such as evaluation rigor, relevance, transparency, independence, and ethics."
3. Scope and Applicability. This policy applies to all evaluations, as defined by [OMB Circular A-11](#) and detailed in [OMB M-20-12](#), conducted at GSA. This policy applies to the Office of Inspector General (OIG) only to the extent that the OIG determines it is consistent with the OIG's independent authority under the Inspector General Act, and it does not conflict with other OIG policies or the OIG mission.
4. Policy. Per the authority listed in the 'Background' section above, GSA is required to develop, implement, and maintain a comprehensive and effective evaluation policy.
 - a. The GSA Evaluation Policy provides clarity on evaluation principles and standards, building on and aligned with Federal evaluation standards. The GSA Evaluation Policy encompasses core principles that will guide GSA's planning, implementation, and use of evaluation to learn what works. These principles align with published Federal standards, detailed in [OMB M-20-12](#). GSA evaluations should always adhere to the following principles:

(1) Rigor. GSA's findings are credible and mean what they say. GSA conducts evaluations to the highest standards¹; design and methods are appropriate for the question(s) asked; the statements are clear and based on rigorous evidence; and the limitations, delimitations, assumptions, and interpretations of findings are transparent. Policymakers and stakeholders can act on GSA's findings with confidence.

(2) Relevance and Utility. GSA addresses questions that are important and provide findings that are actionable and available in time for use. GSA's evaluations take into account: (a) the policy or program priorities of the agency, and (b) the potential impact on a strategic priority. Evaluation findings inform and are integrated into GSA activities, such as budgeting, program improvement, accountability, management, regulatory action, and policy and program development.

(3) Transparency. GSA is committed to ensuring that GSA leadership and staff, agency collaborators, policymakers, researchers, and the public at large are able to learn from the agency's work. GSA is transparent in planning, implementation, and reporting to enable accountability and learning. GSA keeps a public record of priority evaluations fielded and shares findings for those priority evaluations in a timely way (including null results and those that run counter to GSA's own prior expectations and goals).

(4) Independence and Objectivity. GSA evaluations ensure an appropriate level of independence from programmatic, regulatory, policymaking, and stakeholder activities is consistently maintained. GSA demonstrates objectivity, impartiality, and professional judgment throughout the evaluation process and is transparent in planning, implementation, interpretation, and dissemination of evaluations and their results.

(5) Ethics. GSA conducts evaluations to the highest ethical standards and safeguards the dignity, rights, safety, and privacy of participants, stakeholders, and affected entities.

b. The GSA Evaluation Policy Implementation Guidance supplements GSA's above Evaluation Policy by providing operational guidance and resources for GSA's evaluation community. (See Appendix A)

¹ Align with published Federal standards [OMB M-20-12](#)

5. Responsibilities. The EO will implement the agency evaluation policy. All GSA Services and Staff Offices are expected to implement the policy, functions and procedures established herein wholly and immediately.

6. Signature.

/S/ _____
EMILY W. MURPHY
Administrator

Appendix A: GSA Evaluation Policy Implementation Guidance



GSA Evaluation Implementation Guidance

The General Services Administration (GSA) is committed to ensuring a strong culture of evaluation, evidence building, and learning. GSA generates and uses rigorous evidence to inform policy and programmatic decisions. Evaluation activities and results inform decisions across GSA, better enabling GSA to meet its mission to deliver value and savings in real estate, acquisition, technology, and other mission-support services across the government.

This implementation guidance supplements GSA's Evaluation Policy, providing operational guidance and resources for GSA's evaluation community. Taken together with the policy, this lays out the foundational framework for evaluations at GSA. The policy applies to all evaluations at GSA, and this toolkit is intended for use by staff throughout GSA. The use of "we" or "our" is intended to encompass the whole onboard staff.

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GSA's evaluation approach

Evaluation empowers leaders and staff to better understand what works and why. This enables us to make decisions that make our programs and policies more efficient and effective. Our evaluations link to key learning questions and strategic priorities. We include priority evaluations in GSA's public-facing Annual Evaluation Plan. The Annual Evaluation Plan demonstrates how GSA will address its learning agenda priorities and other key learning questions with evaluations. More broadly, GSA's Evaluation Policy and this associated guidance applies to all evaluations conducted at GSA.

At GSA, Evaluation supports:

- **Organizational learning.** Evaluations answer questions that produce valuable knowledge and inform our understanding of and ability to respond to mission needs and changes in our environment.
- **Program and performance improvement.** Evaluations identify when and how we have met our goals, providing leaders with evidence they need to commit to making program and policy changes, based on whether changes increase our efficiency and/or effectiveness.
- **Resource priority determinations.** Evaluations help us allocate resources, highlighting where they are needed for greatest impact. This helps hold us accountable for our stewardship of public resources. This includes decisions about the future of programs and/or policies, such as whether to continue as is, enhance/scale up, or reduce/scale down.
- **Stakeholder engagement.** Evaluations increase valuable information sharing internally and externally, leading to advances in research, policy, and practice.

GSA's Annual Evaluation Plan

GSA's Annual Evaluation Plan consists of a subset of GSA's evaluation work for the coming fiscal year. These priority evaluations are shared publicly and receive additional resources to ensure successful completion. The list below highlights the criteria considered when making the priority evaluation designation:

Required (i.e., a "yes" automatically triggers inclusion as "priority")

1. Congressional mandate (e.g., required by statute)

Recommended (i.e., information on these criteria would help GSA identify "priority" evaluations)

1. Link with GSA's Learning Agenda
2. Direct link with GSA's Strategic Priorities
3. Size of program funding and/or volume of people served by the program

4. Responsive to a evaluation recommendation (review or audit) by an external source (e.g., Government Accountability Office, Office of the Inspector General)

Additional (i.e., other criteria that could be useful in prioritizing evaluations)

- GSA Administrator's priority
- Priority of the Presidential Administration
- Topic of interest to OMB
- Priority evidence gap filled (whether it pioneers a new approach/innovation)
- Feasible
- Others

Evaluation roles and responsibilities

GSA's Evaluation Officer (EO) will coordinate and engage with GSA stakeholders in carrying out the functional responsibilities assigned to the EO in the Evidence Act Title 1 requirements. The EO will:

- Oversee the GSA-wide implementation of this Evaluation Policy.
- Coordinate and issue GSA's Evidence Act Title 1 deliverables:
 - Capacity Assessments of the coverage, quality, methods, consistency, effectiveness, independence, and balance of GSA's evaluation portfolio, as well as GSA's ability to support the development and use of evaluation;
 - A four-year long Learning Agenda concurrent with the strategic planning process, describing priority learning questions and how they will be addressed; and
 - An Annual Evaluation Plan concurrent with the Annual Performance Plan, describing priority evaluations and key information collections or acquisitions planned for the subsequent year.
- Support the public release of evaluation plans, evaluation report/executive summaries, and action plans/reports on use of results.
- Champion an agency-wide community of practice and capacity building opportunities for GSA as a whole, while serving as an institutional source of guidance for offices on evidence and evaluation.

Each office within GSA is responsible for meeting the standards outlined in GSA's Evaluation Policy. They will:

- Engage in the EO-led Evidence Act processes and deliverable development.
- Ensure compliance with GSA's evaluation policy across the breadth of the office.
- Consult and coordinate with GSA's relevant officers (e.g., Evaluation, Statistical, Data, Privacy, Information Security, Performance Improvement) on development and release of evaluation plans, evaluation reports/executive summaries, and action plans/reports on use of results — as well as the promotion of secondary uses for the data and results.

- Identify and champion capacity building (e.g., training) for office staff in evaluation management and evidence-building methodologies, and encourage staff participation in evaluation communities of practice and other knowledge exchange activities.

GSA's evaluation process

To implement our Evaluation Policy and ensure that we adhere to our core principles, we developed a process that builds on the Federal standards for evaluation and widely adopted best practices. This process is most effective when planned for in the early days of a new program, policy, or initiative. This enables the relevant GSA team to determine up front what evidence is needed to have high quality data available when the team needs it for decision making. The primary evidence and evaluation lead for each office serves as an advisor throughout this process, in close coordination with the program team.

“Program” is used throughout the process to shorten the language and reflect the focus of the work. Substitute in policy, initiative, intervention, organization, etc. for the specific context.

Step	Description	Sample Questions
1. Develop the Program's Logic Model/Theory of Change	Illustrate what the program will do (process) to get the desired results (outcomes).	<i>What are the needs, resources/inputs, and activities?</i> <i>What are the outputs?</i> <i>What are the short, medium, and long-term outcomes?</i> <i>What external influences may influence the program?</i>
2. Create a Stakeholder Engagement Plan	Identify what stakeholders need to be involved and document how they will be engaged, for what purpose, when, and through which channels.	<i>Who are the key stakeholders?</i> <i>What is each stakeholder's interest in the evaluation/results?</i> <i>What is the best way to engage each stakeholder?</i>
3. Identify Evaluation Questions	Draft questions that help answer the learning questions by assessing how and why results are or are not being achieved.	<i>What feedback is needed?</i> <i>What would be helpful to know before scaling up an initiative?</i> <i>Is something not working as expected?</i>

4. Plan the Evaluation	Choose the evaluation type, design, data source, and methodologies that best align with the question, program maturity and needs, data availability, and other constraints.	<i>What approach helps answer the question being asked?</i> <i>How will it be resourced?</i> <i>What is the timeline?</i> <i>What data are available?</i> <i>What are potential challenges or limitations?</i> <i>What are mitigation strategies for risks?</i> <i>How will information be disseminated transparently?</i> <i>Has all appropriate coordination been completed - legal, Common Rule review, privacy, IT security?</i>
5. Check for Relevance	Examine the evaluation idea(s) for feasibility and commitment to using the results to improve.	<i>Is there commitment to making resources available?</i> <i>Are the results timed to inform decision making?</i> <i>Is there commitment to using the results to improve?</i>
6. Conduct the Evaluation	Execute the evaluation plan and track any changes.	<i>Is everything going as planned?</i> <i>How is progress being documented and communicated?</i> <i>Did anything unforeseen occur?</i>
7. Draft Initial Results	Share preliminary analysis with the evaluation team and primary stakeholders to check that the analysis is sound and comprehensive, that any limitations are identified, and that alternative explanations have been addressed to the greatest extent possible.	<i>What were the results?</i> <i>Could they be interpreted in any other way?</i> <i>What caveats exist?</i>
8. Finalize and Disseminate Results	Finalize evaluation materials, checking for completeness and thoroughness. Brief key recommendations and findings to senior leadership. Develop a post-evaluation action	<i>How do these results influence decisions that need to be made?</i> <i>What will happen as a result of the evaluation?</i> <i>What else do we need to know?</i> <i>What will GSA do with the results?</i> <i>What progress are we seeing?</i>

	plan. Publish final report, executive summary, and any post-evaluation action plan(s).	<i>How can learning be shared with the stakeholder community?</i>
9. Use and Apply Evidence	Execute post-evaluation action plan(s) and use evidence for decision making. Observe and improve.	

Plan the evaluation: Evaluation design

Evaluation questions should have a clear purpose and explicitly link to a defined theory of change/logic model for a particular program or policy. Consider the question, the intended use of the results, the program's design and maturity, data availability and maturity, and other constraints when selecting an evaluation type. The proposed level of effort and type of evaluation should align with the operational or strategic value offered to GSA in conducting the evaluation.

Type	It...	Use When...	Helps Us Understand...	Ask...
Descriptive Evaluation	Describes a program or policy (or aspects of it) without inferring causality or measuring effectiveness	The goal is to describe or identify trends or patterns in data or to learn what is happening relative to the program as planned	Relationships (e.g., between program activities and participant outcomes, policies and particular outcomes) and program elements (e.g., participants, components)	<i>What is the landscape within which the program operates?</i> <i>What identified need is the program designed to address?</i> <i>What share of participants report experiencing a certain outcome?</i>
Formative Evaluation	Assesses whether a program is feasible, appropriate, and acceptable for full implementation	We want to learn and improve before full implementation (e.g., pilot during development or redesign) or to obtain baseline data that can be monitored for changes over time	How the program functions so that it can be refined, as well as learn more about suspected needs and uncover new needs. It does not assess overall effectiveness	<i>Is the program feasible, appropriate, and acceptable as currently planned?</i> <i>Does the program feasibly address the identified need?</i> <i>Can the program be implemented as designed?</i>
Process or Implementati	Assesses how a program is	All the program components are in	What the program is doing and areas for	<i>Was the program implemented as intended?</i>

on Evaluation	delivered relative to its theory of change	place	improvement in the program's operations	<i>How is the program operating in practice? What resources are being described as needed for implementation?</i>
Outcome Evaluation	Assesses the extent to which a program achieved its intended outcome(s)	After the program has been fully implemented for a reasonable period of time	Program results and short-term effects of the program	<i>Were the intended outcomes of the program achieved? Is the program associated with positive outcomes for all types of beneficiaries or only specific subgroups?</i>
Impact Evaluation	Assesses the causal impact of a program on outcomes by comparing observed outcomes with what would have happened in the absence of the program	The intervention is well-defined, controllable, and uniformly administered	Whether to scale from a pilot stage or whether a mature program is producing the intended change	<i>Does it work? Does the program cause positive outcomes for participants?</i>
Economic Evaluation	Assesses a program's benefits (outputs or outcomes) relative to the costs (resources expended) to produce them	Outputs and outcomes can be monetized	Value in a way that informs prospective program design or retrospective comparison of alternatives	<i>Is the program cost-effective? Do the benefits of the program outweigh the program costs? What is the most cost effective option to achieve this outcome?</i>

Finalize and disseminate results

Evaluations included in GSA's Annual Evaluation Plan are suitable for wide dissemination in an accessible form for internal and external evaluation stakeholders. We keep a public record of all Annual Evaluation Plan activities and publicize findings (including null results and those that run counter to our own prior expectations and goals). Evaluations not included in GSA's Annual Evaluation Plan generally are suitable for wide internal dissemination. Some may have a broader or a more targeted dissemination plan, defined during planning. For example, evaluations involving classified, personal, or proprietary information may result in a narrower distribution.

Our evaluation reports, executive summaries, and other products include: 1) detailed explanations of the design and methods to allow for reproduction or replication; 2) findings that

are specific, concise, and supported by the data, 3) recommendations that are action-oriented and practical, and 4) meaningful discussion of limitations and challenges. GSA shares post-evaluation action plans and tracks what learning occurred and how evaluation findings, conclusions, and recommendations are used to improve programs. All public facing material will follow the standard Office of Strategic Communications processes and review.

Annex

Evaluation resources

Evidence-based Policy Making Act

- OMB Memorandum [M-19-23](#): *“Phase 1 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Learning Agendas, Personnel, and Planning Guidance”*
- OMB Memorandum [M-20-12](#): *“Phase 4 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Program Evaluation Standards and Practices”*
- OMB Memorandum [M-21-27](#): *“Evidence-Based Policymaking: Learning Agendas and Annual Evaluation Plans”*
- Federal Evidence and Evaluation [Community of Practice](#) includes
 - Evidence Act Implementation Support
 - Resources and Toolkits
 - Collaborative Space for Cross-Agency Work
 - Monthly Workshops Hosted by Agencies
 - Evaluation and Evidence Training Series

Within GSA

- [GSA's Evaluation Policy](#)
- Office of Evaluation Sciences ([OES](#)), within the Office of Government-wide Policy, hosts a website with information on OES's approach to evaluation, evaluation summaries, guides, and more.
- OES' Evidence Act [Toolkits](#)
 - Annual Evaluation Plan [Overview](#)
 - Evaluation [Planning Tips](#)
 - Sample Evaluation [Summary Description](#)
 - [Guide](#) for Developing Your Agency's Annual Evaluation Plan, especially Section 5 on additional resources (pages 17-18)

Evaluation and performance

Evaluation is complementary to, yet distinct from, performance measurement and monitoring. Performance measurement helps us identify priority questions to address through evaluation, uncover variations in performance that warrant study, indicate that many participants in a program experience a particular outcome, and suggest what types of indicators are important.

Evaluation picks up from here to help staff answer priority questions, explain variations over time or across sites, and clarify which indicators are predictive of an activity's success. Collaboration between performance and evaluation functions leads to stronger evidence building overall.

Key evaluation terminology

Chief Data Officer: The senior agency official with authority and responsibility for data governance and lifecycle data management.

Conclusions: The interpretation of an evaluation's findings, taking into account the context and available data sources relevant to the evaluation.

Descriptive Evaluations: Quantitative or qualitative in nature, these seek to describe a program, policy, organization, or population without inferring causality or measuring effectiveness. While not all descriptive studies are evaluations, some may be used for various evaluation purposes (e.g., to understand relationships between program activities and participant outcomes, measure relationships between policies and particular outcomes, describe program participants or components, and identify trends or patterns in data).

Design and Methods: The structure of an evaluation that answers the evaluation question(s), 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.

Economic Evaluation: An assessment of the benefits (outcomes, outputs) relative to the cost (resources expended) required to produce those results. It can be used to answer questions like "has the intervention been cost effective compared to alternatives?" or "do the benefits of program X outweigh program costs?"

Evaluation: "An assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency."¹ Evaluation can look beyond the program, policy, or organizational level to include assessment of particular projects or interventions within a program, or particular aspects of a policy, function, or unit within an organization. Importantly, there are different types of evaluation each of which address different questions (see Formative Evaluation, Impact Evaluation, and Process/Implementation Evaluation). Evaluations may address questions related to the implementation or institution of a program, policy, or organization; the effectiveness or impact of

¹ Evidence Act § 101(e)(4)(B) (citing 5 U.S.C. § 311(3)).

specific strategies related to or used by a program, policy, or organization; and/or factors that relate to variability in the effectiveness of a program, policy, or organization or strategies of these. Evaluations can also examine questions related to understanding the contextual factors surrounding a program, as well as how to effectively target specific populations or groups for a particular intervention. They can provide critical information to inform decisions about current and future programming, policies, and organizational operations. Finally, evaluations can and should be used for learning and improvement purposes, as well as accountability purposes.²

Evaluation Activities: The planning, implementation, management and reporting of activities overseen or coordinated by evaluators and related staff within a Federal agency. This includes, but is not limited to: developing and coordinating multi-year Learning Agendas, establishing Annual Evaluation Plans, planning and managing or conducting specific evaluations, summarizing evaluation findings for particular programs or policies, supporting other offices within an agency to interpret evaluation findings, and bringing evaluation-related evidence to bear in decision-making.

Evaluation Officer: The senior agency official with authority and responsibility for providing leadership over the agency's evaluation and learning agenda activities.

Evaluators: Federal staff and associated partners who are training — through advanced education and evaluation experience (e.g., quantitative, qualitative and/or mixed-method evaluation specializations) — to properly plan, implement, manage, and/or oversee evaluation activities and evaluations. Some agencies may use interagency agreements, Federal awards, or other agreements to support the planning and implementation of these activities using qualified evaluators.

Evidence and Evaluation Lead: A designated individual in an office, who has in-depth subject matter expertise in evidence building and evaluation and advises , manages, and/or conducts evaluations. This person coordinates local responses to Evidence Act requirements and ensures compliance with this policy across the breadth of the office..

Feasibility: The extent to which an evaluation is practical, including having an adequate budget, data collection and analysis capacity, staff time, and stakeholder buy-in required to answer the evaluation question(s).

Findings: The raw data and summary analyses that comprise the backbone of an evaluation.

Formative Evaluation: An assessment of whether a program, policy, or organizational approach — or some aspect of these — is feasible, appropriate, and acceptable before it is fully implemented. It may include process and/or outcome measures. However, unlike outcome and impact evaluations, it focuses on learning and improvement and does not aim to answer questions of overall effectiveness.³

² See OMB Circular No. A-11, § 200.22, at 640 available at <https://www.whitehouse.gov/wp-content/uploads/2018/06/a11.pdf#page=640> (see first paragraph under the definition of “evaluation”).

³ See OMB Circular No. A-11, § 200.22, at 640–41, available at <https://www.whitehouse.gov/wp-content/uploads/2018/06/a11.pdf#page=640>.

Impact Evaluation: An assessment of the causal impact of a program, policy, or organization, or aspect thereof, on outcomes relative to those of a counterfactual. It estimates and compares outcomes with and without the program, policy, or organization, or aspect thereof. It includes both experimental (i.e., randomized controlled trials) and quasi-experimental designs.⁴ It can help answer the question, “does it work, or did the intervention lead to the observed outcomes?”⁵

Integrity: The quality of being sound and unimpaired. Evaluations, methodologies, and data collection should have safeguards to minimize the risk of error or manipulation.

Intervention: A combination of program elements or strategies related to the design and implementation of programs and policies designed to produce specific results.

Learning Question: A question that helps inform programmatic, operational, regulatory, or policy decision-making. When answered, it builds evidence that has an impact on the agency’s functioning and performance. Learning questions do not need to be answerable with one study. Important questions often require sub-questions and multiple studies or analyses, typically building on each other, to create a useful and actionable body of evidence.

Logic Model: A graphic depiction that shows the relationship between a program’s resources (inputs), activities (interventions), outputs, and intended short-term (knowledge/awareness), medium-term (behavior), and long-term (change of condition) outcomes. See Theory of Change.

Outcome: A result or effect of an action, situation, or event. These typically represent results to which a given program contributes but for which it is not solely responsible. Short-term outcomes focus on knowledge/awareness; medium-term outcomes focus on changes in behavior; and long-term outcomes focus on change in condition(s).

Outcome Evaluation: An assessment of the extent to which a program, policy, or organization has achieved its intended outcome(s) that focuses on outputs and outcomes to assess effectiveness. Unlike impact evaluations, it typically cannot discern causal attribution. Importantly, it is distinct from, but complementary to, performance measurement. It can help answer the question “were the intended outcomes of the program, policy, or organization achieved?”⁶

Output: Something produced by a program or process. These are typically directly attributable to the program activities.

Performance Improvement Officer: The senior agency official with authority and responsibility for ensuring that the mission and goals of the agency are achieved.

⁴ Per U.S. Gov’t Accountability Office, GAO-12-208G, *Designing Evaluations* 40 (rev. 2012), available at <https://www.gao.gov/assets/590/588146.pdf>, experiments in the evaluation context are most suitable for service and other programs where clearly defined interventions can be standardized and controlled; coverage is limited (small-scale); and randomly assigning participants is feasible and ethical. Experiments measure outcomes, preferably before and after the intervention, for a randomly assigned treatment group and a nonparticipating control group.

⁵ See OMB Circular No. A-11, § 200.22, at 640, available at <https://www.whitehouse.gov/wp-content/uploads/2018/06/a11.pdf#page=640>.

⁶ *Id.*

Performance Indicator: A measure of an expected output or outcome based on the program's logic model.

Performance Measurement: The ongoing monitoring and reporting of program accomplishments, particularly progress toward pre-established goals. It is typically conducted by program or agency management. Performance measures may address the type or level of program activities conducted (process), the direct products and services delivered by the program (outputs), or the results of those products and services (outcomes).⁷ It typically cannot discern causal attribution. It is used to measure progress toward goals and also used to find ways to improve progress, reduce risks, or improve cost-effectiveness.⁸

Performance Monitoring: The ongoing and systematic collection of performance indicator data and other quantitative or qualitative information to reveal whether implementation is on track and whether expected results are being observed. This includes monitoring outputs and strategic outcomes.

Precision: Data have a sufficient level of detail to permit management decision-making.

Process or Implementation Evaluation: An assessment of how a program or service is delivered relative to its intended theory of change, often including information on content, quantity, quality, and structure of services provided. It can help answer the question, "was the program, policy, or organization implemented as intended?" or "how is the program, policy, or organization operating in practice?"⁹

Program: A set of projects or activities¹⁰ that support a higher level objective or goal. It includes processes, projects, interventions, policies, operations, activities, entities, and functions.¹¹ Program operations are the strategies, processes, and activities management uses to convert program inputs into program outputs.¹²

⁷ See U.S. Gov't Accountability Office, GAO-11-646SP, *Performance Measurement and Evaluation: Definitions and Relationships* (May 2011), available at <https://www.gao.gov/assets/80/77277.pdf#page=2>.

⁸ See Office of Mgmt. and Budget, Exec. Office of the President, OMB Circular No. A-94, *Guidelines and Discount Rates for Benefit-Cost Analysis of Federal Programs* 5 (Oct. 1992), available at <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/circulars/A94/a094.pdf#page=5>.

⁹ See OMB Circular No. A-11, § 200.22, at 640, available at <https://www.whitehouse.gov/wp-content/uploads/2018/06/a11.pdf#page=640>.

¹⁰ Per Office of Mgmt. & Budget, Exec. Office of the President, OMB M-18-04, *Monitoring and Evaluation Guidelines for Federal Departments and Agencies that Administer United States Foreign Assistance* 2 (2018), available at <https://www.whitehouse.gov/wp-content/uploads/2017/11/M-18-04-Final.pdf#page=3> (defining "program"), note that at some agencies, an activity carries out an intervention or set of interventions through a Federal award, and a project is a set of complementary activities, over an established timeline and budget, intended to achieve a discrete result. An intervention is a combination of program elements or strategies related to the design and implementation of programs and policies designed to produce specific results.

¹¹ See GAO-18-568G, ¶ 8.08 (describing the term "program"); OMB M-18-04, at 2 (defining the term "program"). Consistent with OMB Circular No. A-11, this guidance recognizes "that agencies and their stakeholders currently use the term 'program' in different ways. Agencies have widely varying missions and achieve these missions through different programmatic approaches, so differences in the use of the term 'program' are legitimate and meaningful. For this reason, OMB does not prescribe a superseding definition of 'program'; rather, consistent with the GPRA Modernization Act, agencies may identify programs consistent with the manner in which the agency uses programs to interact with key stakeholders and to execute its mission." OMB Circular No. A-11, § 200.22, at 647, available at <https://www.whitehouse.gov/wp-content/uploads/2018/06/a11.pdf#page=647>.

¹² See GAO-18-568G, ¶ 8.38(e) (describing the term "program operations").

Program Evaluation: See Evaluation.

Program Manager: An individual overseeing and coordinating activities related to a strategic program, project or initiative. This person is a user of evaluation, determining what program components would benefit from evaluations, how they should be evaluated, and when they should be evaluated.

Program Staff: The individuals responsible for executing a program. They participate in evaluations and are often part of the program evaluation team.

Recommendations: The proposed actions or changes based on the findings and conclusions of an evaluation. They should be objective, informed, and appropriate given the evaluation design and methodology, as well as the program being evaluated.

Reliability: The quality of being dependable. Evaluations, methodologies, and data should be stable, yielding the same results over time.

Statistical Official: The senior agency official with authority and responsibility to advise on statistical policy, techniques, and procedures.

Theory of Change: A map that illustrates how a program operates to produce desired outcomes. See Logic Model.

Validity: The quality of being well-grounded and correct. Evaluations, methodologies, and data should be clear and adequately represent the intended concept or result.