

September 14, 2018

The Honorable Margaret Weichert
Deputy Director for Management
Office of Management and Budget
The White House
Washington, D.C. 20500

Submitted electronically to performance@omb.eop.gov

Re: Comments on OMB'S Request for Information on "Establishing a Government Effectiveness Advanced Research Center" (83 FR 38183)

Dear Deputy Director for Management Weichert:

Thank you for the opportunity to provide feedback on the White House Office of Management and Budget's (OMB) proposal for "Establishing a Government Effectiveness Advanced Research (GEAR) Center."¹ My comments are substantially informed by the work of the U.S. Commission on Evidence-Based Policymaking, in addition to work conducted by the Bipartisan Policy Center (BPC) over the past year to promote more evidence-based policymaking in government. These comments specifically: (1) suggest conceptual framing regarding how the GEAR Center could well align with the evidence-building community, (2) offer several relevant models for establishing an effective GEAR Center design, and (3) provide brief feedback on other aspects of the Request for Information (RFI).

I. Conceptual Framing for the GEAR Center

OMB'S RFI on the GEAR Center describes that the intent is to initiate a partnership that engages interdisciplinary experts to develop new approaches for government's management challenges. During the virtual conference, OMB staff emphasized a role specifically for procurement, information technology, and human resource improvements.²

¹ Office of Management and Budget. (2018). "Request for Information: Establishing a Government Effectiveness Advanced Research (GEAR) Center." *Federal Register* 83, pp. 31183-31184. Available at <https://www.gpo.gov/fdsys/pkg/FR-2018-08-03/pdf/2018-16615.pdf>

² OMB. (2018). GEAR Center Virtual Conference. Washington, D.C. Available at; <https://www.performance.gov/2018-08-31-GEAR-conference-highlights.md/>

In concept, the GEAR Center seems to be a logical and productive resource for a broad network of stakeholders that actively encourages testing and innovation to inform improved government practices and services. This network was referred to as the evidence-building community by the U.S. Commission on Evidence-Based Policymaking in its final report, provided to Congress and the president in 2017.³ According to the commission, the evidence-building community—

“...is meant to describe the collective set of individuals located both inside and outside the Federal government who fulfill a set of roles key to generating evidence for use in policymaking. The evidence-building community includes individuals situated across government and in the business, non-profit, and academic sectors. The community includes individuals who perform statistical activities, such as collecting data to produce national indicators relevant to the country. The community includes researchers who study ways to improve government’s programs and policies and evaluators who assess whether those programs and policies are achieving their intended goals. The community also includes individuals who support program administrators with analysis to achieve targeted improvements to their programs and policies.”⁴

Needless to say, the commission viewed that those who participate in developing policy-relevant research and evaluation aimed at improving government should be considered part of this evidence-building community.

Fortunately, the community already exists today, and is quite vibrant. But, in many cases, those who are part of the community do not identify synergistic or complementary roles. Ontological, disciplinary, and organizational silos inhibit the ability of the community to work together to accomplish shared goals. Sometimes these silos are also evident within government itself. Recognizing this, the commission specifically recommended that OMB take steps to lead this community such that respective units can “increasingly work together to realize the commission’s vision” for an effective government that routinely uses evidence to make decisions (see recommendation 5-3).⁵

The GEAR Center could be a useful contribution from the administration and OMB in partially accomplishing the intent of commission recommendation 5-3, including by providing OMB leadership for the larger evidence-building community. However, I note the initial GEAR Center outline appears to be somewhat disconnected from other aspects of OMB’s work to develop a Federal Data Strategy under the President’s Management Agenda and other efforts within the executive branch to implement

³ U.S. Commission on Evidence-Based Policymaking (CEP). (2017). “The Promise of Evidence-Based Policymaking: Report of the Commission on Evidence-Based Policymaking.” Washington, D.C.: Government Printing Office. Available at: <https://bipartisanpolicy.org/commission-evidence-based-policymaking/>

⁴ CEP, 2017, p. 12.

⁵ CEP, 2017, p. 103.

recommendations made by the commission. Given the importance of OMB as a leader in the broader evidence-building community, I encourage OMB to consider how the GEAR Center may be an asset and relate to other efforts within the community to ensure its development is truly complementary.

II. Relevant Models for an Effective Public-Private Partnership Design

The RFI requests information about different models for public-private partnerships that could be considered for informing the design of the GEAR Center. The commission also recognized that partnerships with external entities are vital for successful evidence-based policymaking to occur. The commission said, "external partnerships also can be an effective way to expand government capacity for production of evidence by leveraging the expertise of the non-Federal evidence-building community."⁶

Recommendation 5-1 from the commission specifically encourages agencies in the executive branch to develop effective partnerships. Indeed, there are several productive examples to consider, including those that involve non-federal governmental and non-governmental entities:

- **Federally Funded Research and Development Centers (FFRDCs)** are widely understood public-private research mechanisms guided by Title 48, Part 35 of the *U.S. Code of Federal Regulations*. The dozens of FFRDCs that exist today provide targeted expertise in a range of policy areas and are sponsored largely by the Departments of Defense, Energy, Homeland Security, Transportation, and Treasury. Numerous FFRDCs are designed intentionally to bring together interdisciplinary expertise. Thus, the model could be one that is particularly relevant for accomplishing OMB's goals for the GEAR Center, including related to placement outside government and for a sustainable funding model.
- **The Patient-Centered Outcomes Research Institute (PCORI)** is a nonprofit, nongovernmental organization that was created by Congress in 2010.⁷ PCORI receives some funding from government and also through an established fee mechanism. In turn, the organization conducts studies that inform what health care options work best for patients and other policy-relevant applied research.
- **Policy Labs** have also emerged in recent years, largely funded by a small cohort of foundations. For example, the Lab @ DC started with non-governmental funding to develop stronger policy-relevant information and evidence to support the mayor and city administrator for the decisions that affect city residents.⁸

⁶ CEP, 2017, pp. 91-92.

⁷ Patient-Centered Outcomes Research Institute (PCORI). (2018). About Us. Washington, D.C.: PCORI. Available at: <https://www.pcori.org/about-us>

⁸ The Lab @ DC. (2018). Washington, DC. Available at: <http://thelab.dc.gov/>

Similar labs have popped up across the country and are supported through various funding mechanisms that may merit further exploration for relevance to the GEAR Center design.

Other relevant models for private-partnerships surely exist, though these three seem especially useful in considering the GEAR Center's design. In addition, I encourage OMB to consider that these models could be constructive in enhancing collaboration with state and local governments with relevant expertise and lessons for federal government operations.

III. Other Comments on the OMB GEAR Center RFI

The OMB RFI asks for comment on datasets and models that may encourage investment or other value to society. I encourage OMB to carefully consider the relevance of several high-quality datasets highlighted by the commission that are also managed through strong partnerships:

- ***Vital Records*** data are compiled by the National Center for Health Statistics in partnerships with state and county health offices. These data are invaluable for monitoring public health trends.⁹
- ***The Next Generation Platform*** is a partnership between the Department of Agriculture's Economic Research Service and the Department of Commerce's Census Bureau that improved our ability to understand nutrition assistance programs using data voluntarily provided by states. In addition to improving program operations at USDA, the partnership is helping to lower the cost of the decennial census.¹⁰
- ***The Longitudinal-Employer Household Dynamics (LEHD) Program*** is a partnership between the Census Bureau and states, who voluntarily provide administrative data about wages and earnings. These data can then be used to develop new measures of employment and location information relevant for targeting activities in the workforce.¹¹

These three examples of successful partnerships that have resulted in meaningful data and evidence for informing government, are directly relevant for the management-focused direction of the GEAR Center. Each can also continue to be improved. Vital records partnerships could be enhanced to produce more rapid information. The

⁹ Nick Hart and Anand Parekh. (2018). New suicide statistics demonstrate value of data coordination for vital statistics. Washington, D.C.: Bipartisan Policy Center. Available at: <https://bipartisanpolicy.org/blog/new-suicide-statistics-demonstrate-value-of-data-coordination-for-vital-statistics/>

¹⁰ Nick Hart. (2018). White House roundtable highlights challenges and successes for government data uses. Washington, D.C.: Bipartisan Policy Center. Available at: <https://bipartisanpolicy.org/blog/white-house-roundtable-highlights-challenges-and-successes-for-government-data-uses/>

¹¹ CEP, 2017.

NextGen project could be more comprehensive and timely to inform federal and state decision-making. And LEHD is far from comprehensive in developing a complete picture of income in the country. While each is a success, each also highlights the numerous opportunities for engagement in improving data architecture, quality, and timeliness – and how doing so offers substantial benefits to society. They also highlight the important role states will likely play in the partnership envisioned for the GEAR Center. To the extent possible I encourage deliberate state involvement and collaboration, to the extent possible.

In terms of identifying what data, partnerships, or research will be most relevant moving forward, I strongly encourage the development of an interagency “learning agenda” that would prioritize what aspects of procurement, human resources, information technology, or other aspects of management priorities that may broadly be relevant for the GEAR Center. The commission recommended that agencies develop learning agendas (see recommendation 5-2) as a means of having a strategic plan for evidence-building activities. The real value of a learning agenda is that it can send clear signals to those inside and outside government about what priorities exist for policy-relevant research that can be useful for informing future decisions. Such a construct seems important for framing the potentially broad goals of the GEAR Center moving forward, and for prioritizing management issues.

I appreciate the opportunity to provide comments on the proposal. If you have any questions about these comments or would like to discuss the response further, I can be reached at 202-204-2400 or evidence@bipartisanpolicy.org.

Regards,

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