

Recommendations to Inform the U.S. Department of Education's Research and Evaluation Set-Aside Authority

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The Institute for Higher Education Policy (IHEP) and Results for America (RFA) developed the following recommendations to help inform the U.S. Department of Education's (ED) decision-making regarding how to use its evaluation set-aside authority included in the Fiscal Year 2022 Consolidated Appropriations Act and maintained in the Fiscal Year 2023 Consolidated Appropriations Act. To develop them, we conducted a thorough literature review; spoke with staff at ED, the Institute for Education Sciences (IES), and the U.S. Congress; and collected input from leading evaluation and higher education policy experts.

We appreciate the contributions offered by the experts listed here, who supported the development of these five recommendations by offering their time, knowledge, and varied perspectives, although every expert may not fully endorse each recommendation. These experts are committed to using evidence-based practice and policy to improve outcomes for all students, with a focus on Black, Latinx and/or Hispanic, Indigenous, Asian American, Native Hawaiian, and Pacific Islander (AANHPI) students, and students from low-income backgrounds.

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Introduction

The Fiscal Year 2022 Consolidated Appropriations Act that became law in March 2022 grants the U.S. Secretary of Education (the Secretary) the authority to set aside up to 0.5 percent of funding from Higher Education Act (HEA) programs within the U.S. Department of Education (ED), except the Pell Grant program and Student Aid Administration account, to support rigorous evaluations and the collection and analysis of outcome data for HEA programs (see Appendix A for the full legislative text). This authority was maintained in the Fiscal Year 2023 Consolidated Appropriations Act.

Fully leveraging this set-aside authority would be an important and necessary step toward understanding how to improve interventions and programs to better support students' postsecondary success. While higher education can offer students and their families a better living and a better life, for too many students—particularly Black; Latinx and/or Hispanic; Indigenous; and Asian American, Native Hawaiian, and Pacific Islander (AANHPI) students as well as those from low-income backgrounds—structural barriers to equitable access, persistence, completion, and post-college outcomes prevent that dream from becoming a reality. This set-aside authority to fund evaluations and analysis, especially if maintained in future funding laws, could advance long-term equity-focused, student-centered, and evidence-based policy and practice change by building additional evidence about what interventions (meaning approaches, practices, and supports to promote higher education success) work, for whom, and under what circumstances.

How the Secretary exercises this authority, including how much the Secretary chooses to set aside and for what activities, however, is dependent on how ED shapes its goals and strategy for the use of these dollars. The following five recommendations represent the best thinking of leading policy, research, and evaluation experts for how ED can maximize the potential of the set-aside authority to strengthen the evidence base in order to continuously improve higher education outcomes for all students, with a particular focus on students of color and students from low-income backgrounds.

Recommendations

- 1. The Secretary should maximize the authority granted by Congress by setting aside the full 0.5 percent of funds and pooling these funds to be distributed across research studies according to opportunity and need.**

We recognize that the full 0.5 percent of funds is not available to pool for FY 2022, given that many program expenditures were already obligated before the set-aside authority was granted. To fully maximize this use of authority and increase the likelihood that interventions equitably benefit underserved students, the Secretary should set aside the maximum allowable percentage in FY 2023 and into the future should the authority continue to be maintained. Pooling the funds in this way would support effective research and evaluations that can lead to continuous improvement without arbitrarily limiting the availability of vital resources.

- 2. The Secretary should prioritize evaluating HEA-funded interventions with the goal of identifying practices that most effectively support equitable outcomes for all students, especially those from historically marginalized populations, and using lessons learned to improve HEA programs and maximize the impact of taxpayer dollars.**

Historically, there have been insufficient financial resources and a lack of staff capacity to support rigorous evaluation of the interventions—or approaches, practices, and supports—funded by the HEA.¹ This new set-aside authority represents an important opportunity for ED to invest in comprehensive and equity-focused higher education evidence-building in FY 2022, and well into the future should this authority be available moving forward.

ED should use funds for data collection, data analysis, and rigorous evaluations of interventions that contribute to the field’s understanding of challenges with college persistence and completion, particularly based on racial and socioeconomic inequities, and identify policy and practice solutions for remedying them. Evaluations should contribute to our understanding of which interventions most effectively:

- Support equitable access to higher education for all students, especially for students of color and students from low-income backgrounds.
- Address enrollment declines, particularly among people of color, men, and students from low-income backgrounds.
- Promote completion for currently enrolled or stopped-out students who are close to earning a credential.
- Advance the retention and completion of returning adult learners as well as students who are caretakers.
- Facilitate transfer students’ credit accumulation and transition between postsecondary institutions.
- Support students’ transition between postsecondary education and high-quality jobs.

In the near term, ED should use the pooled funds to evaluate interventions aimed at improving equitable outcomes for students who have historically been excluded from the higher education system, especially those enrolled at minority serving institutions (MSIs) and community colleges. In alignment with ED’s strategic priority of increasing postsecondary value,² wherever possible, interventions should seek to improve and evaluations should examine post-college outcomes such as employment rates, median earnings, and student loan default rates.

Because Congress provided the Secretary with flexibility in how to appropriately exercise the set-aside authority (see Appendix A), conducting program evaluations of HEA programs would unnecessarily narrow its impact, due to wide variation among programs. Instead, to increase impact, ED should evaluate cross-cutting, equity-focused interventions relevant to multiple HEA programs. This approach would inform the continuous improvement of HEA program design and implementation, as well as help expand effective interventions to more institutions and programs, impacting the lives of more students.

By researching and evaluating interventions—and supporting the data collection and analysis necessary to understand the impact of those interventions—ED can better identify practices that have the potential to promote equitable college and post-college outcomes for historically excluded students. Findings from such evaluations, especially should they uncover strong evidence of the efficacy of an intervention, could be broadly applied to support the continuous improvement of HEA programs and our higher education system.

3. **The Secretary should fund a combination of evaluations, data collection, and data analysis with varying research methodologies to support the continuous improvement of HEA programs such that they better serve students, especially those from historically marginalized groups, immediately and into the future.**

Building an evidence base that can support equity-focused practices and policymaking requires evaluations (see Appendix B for definitions of evaluations), data collection, and data analysis that produce results that help key decision-makers implement policy and practice changes to better serve all students, and especially Black, Latinx and/or Hispanic, Indigenous, and AANHPI students, students from low-income backgrounds, and the intersectional identities within and across these groups.

To inform practice and policy that supports continuous improvement, the Secretary should use this authority to:

- a. Fund equity-focused research activities and evaluations. Equity-centered research and evaluation is crucial to understanding the outcomes for students across race/ethnicity and income. Data collection, data analysis, and evaluations funded through this authority should adhere to the IES Standards for Excellence in Education Research’s (SEER) Equity Standard, which states: “Researchers who are designing and testing interventions must clearly demonstrate how those interventions address education inequities, such as by improving learners’ outcomes and/or their access to resources and opportunities.”³
- b. Collect and disaggregate data by race/ethnicity and income, as well as by other demographic factors like gender, age, enrollment status, geographic region, caregiving status, and language. Through the set-aside authority, the Secretary should prioritize opportunities to collect data that would deepen ED’s understanding of how HEA-funded interventions are serving specific subgroups of students, while maintaining student privacy and security. Limitations with current data—for example, the need for finer-grained data to understand outcomes for AANHPI students,⁴ as well as small sample sizes that often lead to suppressed data for American Indian/Alaska Native students⁵—hamper the ability of decision-makers to make fully informed decisions about how to best serve students historically excluded and marginalized by the higher education system. This authority represents an opportunity to build an equity-focused evidence base that is more inclusive of those students’ postsecondary experiences and outcomes and reflects their intersectional identities.
- c. Fund evaluations with methodology appropriate to the research question being studied. Equity-focused questions about the postsecondary outcomes of students, especially historically excluded students, should inform decisions about research and evaluation design and methodology. An openness to employing various methodologies should result in a well-rounded and timely evidence base on which to make informed decisions. Randomized controlled trials (RCTs) and other experimental methodologies eligible for the highest rating by the What Works Clearinghouse⁶ offer crucial information about programs and program interventions. When well designed and well executed, such evaluations provide decision-makers with high levels of confidence that the intervention studied caused the observed effect,⁷ making them valuable for improving program, policy, and practice design.

However, not all program interventions lend themselves to such evaluations because of practical and ethical challenges, including the time and cost required to conduct an RCT or the lack of a control group option. Implementation, replication, and descriptive studies, which include qualitative research, can offer insight into fundamental questions about program design, delivery, and scalability. For example, they can show how current funding is being used, students' experiences, inequities in access and outcomes for certain student groups, and the generalizability of findings. Descriptive studies are also useful for informing policy decisions in shorter time frames because they can produce immediately actionable results. A well-rounded evidence base should incorporate lessons derived from a variety of methodologies.

4. The Secretary should infuse equity into the policymaking process by engaging with researchers, evaluators, and practitioners who are proximate leaders⁸ and who identify with the impacted and marginalized communities these funds could particularly benefit.

Centering equity in policymaking decisions requires that impacted communities are actively engaged, that those communities remain the focal point of the process, and that they are supported by the outcome.⁹ The research and evaluations conducted through this authority represent a key component of the policymaking process—building the evidence base on which to make policy decisions about how the federal government supports students across the country, particularly those who have been historically excluded.

The procurement process offers a variety of opportunities for ED to ensure that proximate leaders—those whose identity, experience, or community are systemically marginalized—are substantively involved in the development, execution, analysis, and interpretation of research and evaluations. We commend ED for thinking critically about how to advance equity in the contracting, procurement, and grant processes through its Equity Plan.¹⁰ In alignment with that goal, we encourage ED to consider the following strategies for developing requests for proposals (RFPs) that prioritize equity-minded applicants who are themselves proximate leaders or who engage substantively with proximate leaders:

- a. Include equity as an evaluation criterion. ED should incentivize proposals that center equity throughout the research and design process by making equity, particularly in staffing, an evaluation factor. For example, ED should consider and assign points for diverse hiring practices. Leveraging language used in the 2022 Education Innovation and Research Notice of Funding Availability, ED should consider the extent to which respondents to RFPs encourage “applications for employment from persons who are members of groups that have traditionally been underrepresented based on race, color, national origin, gender, age, or disability,” alongside the “qualifications, including relevant training and experience, of key project personnel.”¹¹ Additionally, ED should consider and assign points to factors like how respondents propose substantively engaging small and minority-owned businesses—specifically community-based organizations—and proximate leaders in the research and dissemination process, or the equity focus of their research questions and proposed methodology.
- b. Include proximate leaders in technical working groups (TWG). Specify in RFPs funded through this authority that TWGs must include individuals with expertise in equity-centered research and evaluation and who identify with or have prior experience working with marginalized communities as researchers or practitioners. In the near term, ED should work closely with

contractors to form TWGs that include diversity of thought and experience including race/ethnicity, gender, economic status, and methodological expertise. ED should also consider requiring that all responses to RFPs include a list of potential TWG members and consider making it an evaluation criterion in order to further incentivize contractors to think critically about the diversity of the experts with whom they engage.

- c. Ensure review panels are diverse across race/ethnicity, gender, economic status, and methodological expertise. Review panels should include proximate leaders who identify with or have prior experience working with impacted and marginalized communities as well as researchers with varied methodological expertise.
- d. Widely disseminate information about contracting opportunities related to the set-aside authority. For example, ED should use funds to effectively share contracting opportunities with new potential contractors and local evaluators, including by leveraging existing networks like participants and alumni from IES's Early Career Mentoring Program for Faculty at Minority Serving Institutions. RFPs should be written in plain, accessible language and ED should consider offering technical assistance, such as creating extended or flexible deadlines and additional resources (e.g., trainings) that will help new researchers to submit strong proposals.¹²
- e. Leverage requests for information (RFI) to engage proximate leaders. We commend ED for posting the Request for Information Regarding Higher Education Act (HEA) Pooled Evaluation in December 2022.¹³ ED should continue to use RFIs as a means of engaging with community members and researchers who are proximate leaders on broad topics. For example, they can help determine the relative priority or extent of the need to evaluate various interventions. RFIs should be written in clear and straightforward language and used to build new partnerships with organizations and researchers with experience and expertise in working with marginalized communities.

Another long-term strategy to ensure that this set-aside authority supports equity-centered policymaking and better facilitates awarding contracts and grants to a racially diverse group of researchers and evaluators is to implement a co-creation process like the one used by the U.S. Agency for International Development (USAID). The New Partnerships Initiative¹⁴ at USAID is one proven model used by a federal agency that seeks to ensure both rigor and diversity from researchers and practitioners. It includes a three-step process before proposal submission that allows organizations or individuals to become familiar with the contracting process while they create the RFPs. Should this authority be maintained in future years, ED should consider developing and implementing a clear and transparent co-creation model like the New Partnerships Initiative employed by USAID to develop RFPs.

5. **The Secretary should make publicly available and should widely disseminate data and key findings from research and evaluations funded through this authority in such a way that promotes transparency while maintaining privacy. Wide dissemination and transparency are necessary to ensure that decision-makers, including policymakers, program administrators, and students, can leverage evaluation findings to make informed and equity-focused decisions.**

We applaud IES's commitment to improving the public's access to the results of federally funded research in order to facilitate research transparency and accelerate the development of

knowledge.¹⁵ A core component of IES’s SEER is making findings, methods, and data open by ensuring final manuscripts are publicly available and providing access to final research data, while maintaining privacy and confidentiality.¹⁶ Research and evaluations funded through this authority should adhere to these same standards. For example, all investigators leading activities funded by this authority should be required to develop a data management plan that “facilitates access to the final research data used to generate published research findings.”¹⁷

In addition to submitting a report to Congress as required by the legislative text, ED should take a more proactive approach to disseminating final evaluation findings to the public as per the recent White House Office of Science and Technology guidelines that ensure free and equitable access to federally funded research.¹⁸ We suggest that partners and evaluators be required to include a thorough dissemination plan in their proposals to ED. Strong dissemination plans may include:

- Developing a plain language brief that clearly explains key findings and actionable takeaways (where appropriate) so HEA program grantees, practitioners, policymakers, community members, and other stakeholders can meaningfully engage with the research.
- Ensuring all data—including all underlying data used for evaluative purposes, as data privacy limits allow—are accessible through data.gov and other publicly available means.
- Partnering or subcontracting with community leaders and organizations, communication firms—especially small or minority-owned businesses—and/or higher education institutions to facilitate a widespread promotion campaign to ensure HEA program grantees, practitioners, and other stakeholders are made aware of research findings.
- Providing training or technical assistance to HEA program grantees, institutions, states, and other stakeholders to implement relevant policy or practice changes.

To support the robust dissemination plans developed and executed by contractors, ED should ensure final reports and briefs are made publicly available (e.g., on the What Works Clearinghouse website) and leverage existing channels to widely disseminate findings to relevant stakeholders. For example, ED could coordinate with the White House to share research and evaluation findings via White House initiatives on HBCUs; AANHPI individuals; AIAN Education; Advancing Educational Equity, Excellence, and Economic Opportunity for Black Americans; and Advancing Educational Equity, Excellence, and Economic Opportunity for Hispanics. Further, ED could work with associations that represent institutions and grantees to share findings with those stakeholders.

Conclusion

The authority granted to the Secretary in the FY 2022 and FY 2023 Consolidated Appropriations Acts to set aside funds for the purpose of data analysis, data collection, and rigorous evaluations presents an important opportunity for ED to strengthen the evidence base that supports continuous improvement within higher education. To fully leverage this set-aside authority, we recommend the Secretary:

1. Set aside the full 0.5 percent of funds and pool these funds to be distributed across research studies according to opportunity and need.
2. Prioritize evaluating HEA-funded interventions to develop widely applicable lessons that support the continuous improvement of HEA programs and maximize the impact of taxpayer dollars.
3. Fund a combination of evaluations, data collection, and data analysis to produce a well-rounded evidence base from which to make policy and practice decisions.

4. Infuse equity into the policymaking process by engaging with researchers, evaluators, and practitioners who are proximate leaders.
5. Make publicly available and widely disseminate data and key findings to ensure decision-makers can leverage this evidence base to make informed decisions.

These expert-informed recommendations are intended to serve as a resource for ED as it considers how best to use the set-aside authority to drive equitable postsecondary outcomes for all students, with a particular focus on Black, Latinx and/or Hispanic, Indigenous, AANHPI students, and students from low-income backgrounds.

Appendix A. Excerpt from Consolidated Appropriations Act, 2022

SEC. 312. The Secretary may reserve not more than 0.5 percent from any amount made available in this Act for an HEA program, except for any amounts made available for subpart 1 of part A of title IV of the HEA, to carry out rigorous and independent evaluations and to collect and analyze outcome data for any program authorized by the HEA: *Provided*, That no funds made available in this Act for the “Student Aid Administration” account shall be subject to the reservation under this section: *Provided further*, That any funds reserved under this section shall be available through September 30, 2024: *Provided further*, That if, under any other provision of law, funds are authorized to be reserved or used for evaluation activities with respect to a program or project, the Secretary may also reserve funds for such program or project for the purposes described in this section so long as the total reservation of funds for such program or project does not exceed any statutory limits on such reservations: *Provided further*, that not later than 30 days prior to the initial obligation of funds reserved under this section, the Secretary shall submit to the Committees on Appropriations of the Senate and the House of Representatives, the Committee on Health, Education, Labor and Pensions of the Senate, and the Committee on Education and Labor of the House of Representatives a plan that identifies the source and amount of funds reserved under this section, the impact on program grantees if funds are withheld for the purposes of this section, and the activities to be carried out with such funds.

Appendix B. Federal Definitions of Evaluations

There have been several executive branch, legislative branch, and department level efforts to formalize an evaluation process and framework for assessing federal policies. The Foundations for Evidence-Based Policymaking Act of 2018 ("Evidence Act")¹⁹ mandates that agencies add evaluation priorities to strategic plans that outline key questions aimed at informing policymaking. The Government Accountability Office (GAO) has published numerous reports outlining evaluations of Department of Education programs as well as recommendations for future evaluations.²⁰

In a memo for heads of executive departments and agencies, the Office of Management and Budget (OMB),²¹ defines evaluation as "an assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency." Relevant statutes and guidance issued since 2009 encourage federal agencies to use multiple sources of evidence in program management.²² GAO suggests that evidence may include

administrative records—a source of evidence consisting of qualitative or quantitative data collected or produced as part of a program's operation; policy analysis—a source of evidence consisting of a systematic process of identifying and comparing potential options for addressing a policy problem based on certain criteria and choosing the option that best meets the criteria; program evaluation—an assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency; performance measurement—the ongoing monitoring and reporting of a program's accomplishments and progress, particularly towards its pre-established goals; [and] statistical analysis—a form of evidence that uses quantitative measurements, calculations, models, classifications, and/or probability sampling methods to describe, estimate, or predict one or more conditions, outcomes, or variables, or the relationships between them.²³

The U.S. Department of Education Evaluation Policy Standards mirror OMB's guidance on program evaluation standards and practices.²⁴ The policy states, "ED undertakes evaluations so that it can better meet its mission of promoting student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access" and "these activities contribute to a larger goal of improved outcomes for all learners."

Both OMB and ED standards for evaluation include relevance, utility, rigor, independence and objectivity, transparency, and ethics. They seek to encourage these actions:

- Build and maintain evaluation capacity.
- Use expert consultation effectively.
- Establish, implement, and widely disseminate an agency evaluation policy.
- Pre-specify evaluation design and methods.
- Engage key stakeholders meaningfully.
- Plan dissemination strategically.
- Take steps to ensure ethical treatment of participants.
- Foster and steward data management for evaluation.
- Make evaluation data available for secondary use.
- Establish and uphold policies and procedures that protect independence and objectivity.

These guidelines encourage evidence building to analyze programs and interventions. This may include, but is not limited to, determining effectiveness, efficiency, impact, outcomes, and other observations. The purpose of evaluations is continuous improvement with the goal of creating policies and practices that better serve students across the country, especially those students who have historically been excluded or marginalized by the higher education system.

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- ² U.S. Department of Education. (2022, July). *Fiscal years 2022–2026 strategic plan*. <https://www2.ed.gov/about/reports/strat/plan2022-26/strategic-plan.pdf>
- ³ Institute of Education Sciences. (2022, June 16). Standards for excellence in education research: Equity. <https://ies.ed.gov/seer/equity.asp>
- ⁴ Byon, A., & Roberson, A. J. (2020, May). Everyone deserves to be seen. Recommendations for improved federal data on Asian Americans and Pacific Islanders (AAPI). IHEP. <https://www.ihep.org/publication/everyone-deserves-to-be-seen-recommendations-for-improved-federal-data-on-asian-americans-and-pacific-islanders-aapi/>
- ⁵ Falkenstern, C., & Rochat, A. (2021, February). Better data for supporting American Indian/Alaska Native Students. Western Interstate Commission on Higher Education. <https://www.wiche.edu/resources/wiche-insights-better-data-for-supporting-american-indian-alaska-native-students/>; Lumina Foundation. (2021, February). *Changing the narrative on student borrowers of color*. <https://www.luminafoundation.org/wp-content/uploads/2021/02/borrowers-of-color-2.pdf>
- ⁶ Randomized control trials (RCTs), regression discontinuity designs (RDDs), and single-case designs (SCDs) are the designs eligible for the research rating, “Meets WWC Standards Without Reservations” because researchers and administrators exercise strong control over participant assignment. All three of these designs are considered to be “experimental,” according to the U.S. Department of Education’s evidence definitions (34 CFR, Part 77).
- ⁷ What Works Clearinghouse. (2022, August). *What Works Clearinghouse: Procedures and standards handbook, version 5.0*. U.S. Department of Education, Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance (NCEE). <https://ies.ed.gov/ncee/wwc/Handbooks>
- ⁸ Jackson, A., Kania, J., & Montgomery, T. (2020, October). Effective change requires proximate leaders. *Stanford Social Innovation Review*. https://ssir.org/articles/entry/effective_change_requires_proximate_leaders
- ⁹ Flores, S., & Voight, M. (2022, January). “Opening the promise”: *The five principles of equitable policymaking*. IHEP. <https://www.ihep.org/publication/opening-the-promise/>
- ¹⁰ U.S. Department of Education Office of the Secretary. (2022, April). 2022 agency equity plan related to Executive Order 13985. <https://www2.ed.gov/documents/equity/2022-equity-plan.pdf>
- ¹¹ U.S. Department of Education (2022, April). Federal Register Vol. 87, No. 81: Applications for New Awards; Education Innovation and Research (EIR) Program—Early Phase Grants. <https://www.federalregister.gov/documents/2022/04/27/2022-09084/applications-for-new-awards-education-innovation-and-research-eir-program-early-phase-grants>
- ¹² Creger, H. (2020, September). *Making racial equity real in research*. Greenlining Institute. <https://greenlining.org/wp-content/uploads/2020/10/Greenlining-Making-Racial-Equity-Real-2020.pdf>
- ¹³ U.S. Department of Education (2022, December). Federal Register Vol. 87, No. 242: Request for Information Regarding Higher Education Act (HEA) Pooled Evaluation. <https://www.federalregister.gov/documents/2022/12/19/2022-27474/request-for-information-regarding-higher-education-act-hea-pooled-evaluation>
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- ¹⁷ Institute for Education Sciences. IES policy regarding public access to research. <https://ies.ed.gov/funding/researchaccess.asp>
- ¹⁸ Executive Office of the President, Office of Science and Technology. (2022, August). Memorandum for the heads of executive departments and agencies. <https://www.whitehouse.gov/wp-content/uploads/2022/08/08-2022-OSTP-Public-Access-Memo.pdf>

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- ¹⁹ Pub. L. No. 115-435, 132 Stat. 5529 (2019). <https://www.congress.gov/jl5/plaws/publ435/PLAW-115-435.pdf>
- ²⁰ Government Accountability Office. Department of Education reports. <https://www.gao.gov/agencies/department-education>
- ²¹ Executive Office of the President, Office of Management and Budget. (2021, June 30). Memorandum for heads of executive departments and agencies. <https://www.whitehouse.gov/wp-content/uploads/2021/06/M-21-27.pdf>
- ²² Government Accountability Office. (2021, March). *Program evaluation: key terms and concepts*. <https://www.gao.gov/assets/gao-21-404sp.pdf>
- ²³ Government Accountability Office. (2005, September). A glossary of terms used in the federal budget process (supersedes AFMD-2.1.1). <https://www.gao.gov/products/gao-05-734sp>
- ²⁴ U.S. Department of Education. (2020, August 12). The U.S. Department of Education evaluation policy. <https://www.ed.gov/sites/default/files/cdo/20-0177-evaluation-policy.pdf>