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A FEDERAL PERSPECTIVE ON
EVALUATING THE EVALUATORS

By

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INTRODUCTION

I am pleased to appear with this panel to discuss the benefits and feasibility of evaluating the evaluators. Dick Johnson has combined the right mix both of representation and experience in putting it together. We represent industry, universities and government and we have experience both in structuring the necessary data systems and in evaluation standards which would be a primary basis for the criteria.

My first reaction to Dick's invitation was to agree out of some sense of obligation but with some doubt that the idea of evaluating the evaluators was timely, particularly from the Federal perspective which I was asked to address. However, I found that committees of both the House of Representatives and Senate are actively considering similar bills which would require agencies to evaluate their evaluators. Both bills would provide statutory guidelines concerning the award of contracts for the procurement of consulting services, management and professional services, special studies and analyses and clarify the authority for appointment and compensation of experts and consultants. Clearly, much of the evaluation work done for the Federal Government would be

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affected by such a bill if it became law. I am making no forecast of the chances of passage but it can be said significant interest still exists in the Congress in guaranteeing that the Federal government has adequate data on services procured and adequate evaluations of the usefulness of the services.

The current efforts of the administration to reduce the size and cost of Federal programs presents an opportunity to improve program evaluations. More than ever, Federal officials will need to know the success or failure of programs that are candidates for elimination. Also, in these times of budget reductions, anything that offers the hope of controlling waste, fraud, abuse and mismanagement in the Federal government is likely to be considered. Statements made by congressional leaders during consideration of Mr. Charles Bowsher as the next Comptroller General of GAO indicate that GAO will be expected to be a model for the Government in this respect and to provide leadership in promoting greater economy and efficiency in public expenditures. With regard to consultant services, there is some sense of impatience. In its recent testimony on the Senate bill to enact a consultant reform and disclosure act, GAO stated that it had issued over 30 audit reports in the last 20 years on this subject, but still sees little evidence that agencies are acting administratively to correct abuses. Further, GAO normally does not support legislative remedies for problems that could be resolved administratively. However, since executive branch agencies, with few exceptions, have not acted administratively, GAO believes congressional action is necessary.

During my preparation I made personal calls to the Office of Personnel Management asking about any new initiatives. Also, I found that OPM and OMB testified in opposition to the Senate bill on consultant reform and disclosure.

Least I leave you with an impression that the executive branch has done nothing, I need to mention the efforts of OPM and the Office of Management and Budget (OMB) to establish data systems and management controls. The OMB issued Circular A-120, April 14, 1980, on guidelines for the use of consulting services and this circular supersedes OMB Bulletin 78-11 dated May 5, 1978 on the same subject. The bulletin was issued to meet the identified need for uniformity of definition, criteria and management controls among the agencies. The recent circular provides permanent guidance on the subject. The circular covers consulting services obtained by personnel appointment, procurement contracts and advisory committee membership. There has been confusion about the definition of what is covered with some tendency on the part of the Congress and GAO to include more than would be included under the OMB definition. OMB has defined consulting services of a purely advisory nature relating to the governmental functions of agency administration and management and agency program management. This sounds as though evaluation might not be included but specific examples of what the circular says should be included are advice on or evaluation of agency program management, specifically including program plans, technical and cost proposals, economic impact, program impact and mission and program analysis. Clearly these examples cover a lot of program evaluation activities.

The OMB circular includes requirements for the continuation of a Central Personnel Data File (CPDF) operated by OPM and a Federal Procurement Data System (FPDS) operated by GSA. Advisory committee data is maintained separately under OMB circular A-63 in compliance with specific legislation governing advisory committees.

The OPM personnel data file was implemented in 1972 as a temporary system until a more complete system proposed in 1968 by the Civil Service Commission

(now OPM) could be implemented in the 1980s. Under this system evaluators employed by the Federal government on a temporary or intermittent basis are classified either as regular government employees or as special government employees depending on whether they work more or less than 130 days a year. In either case they would be included in the CPDF. The interim system contains 40 data elements and the new system is expected to contain 3 times more data. It is being evaluated through test in the Air Force and in Health and Human Services but I have not seen the the results of any evaluation of this system. The OPM definition of consultant, while somewhat different than the OMB definition, also means a person who serves as an advisor, and also states that the advisor is ordinarily an expert in the field but need not be a specialist. According to OPM, this expertise may consist of a high order of broad administrative, professional or technical experience indicating ability and knowledge that makes this person's advice distinctly valuable to the agency.

The GSA's Federal Procurement Data Center collects 110 elements of data on all Federal contracts over \$10,000 and requires a yes/no response as to whether the contract is for consultant services. OMB officials have stated that this system will have the capability to provide the Congress, the administration, and others with more comprehensive and uniform statistical data than was available before on consultant services but that it will have limited capability for detecting abuses in agency contracting procedures.

Both of the bills under consideration in the Congress would require a written agency evaluation of consulting and professional contracts in excess of \$50,000. The evaluation would summarize the performance of the contractor based first on the terms and specifications included in the contract and second any deviation from the provisions of the contract originally awarded with

respect to cost and time for completion and a statement of the reasons for any such deviation. The agency would be required to maintain a central file of such evaluations including any comments submitted by the contractor within 10 days after receipt of a copy of the evaluation.

FUTURE POSSIBILITIES

It seems that the Federal data systems being implemented will provide the basic source of data for our professional societies to use if we want to test our ability and the feasibility of evaluating the evaluators. The draft standards for evaluation circulated to ERS members in May 1980 have been further improved and the ERS Council has approved publication of these 55 standards as an initial set of standards for program evaluation. Among other things these standards would require clear statements of the objectives of an evaluation, and the type of evaluation to be conducted including the range of activities to be undertaken. Further, the standards state that evaluators should not accept obligations that exceed their professional qualifications or the resources available to them. These standards are very much in line with the more general Federal requirements being developed for clearly specifying all consultant and contractor activities.

I do not want to over simplify the difficulty of doing such evaluation. For example, performance evaluations are required of architect and engineer work done for the government and GAO reviews have found even in that well established area of professional work that there have been difficulties in obtaining anything other than subjective evaluations.

The work of Certified Public Accountants is not covered by the data systems that I have mentioned, but the Intergovernmental Audit Forum continues efforts in this direction. In that area, legislation is also under considera-

tion which would require a quality review process to be developed by OMB in consultation with the Comptroller General. Since auditors are often involved in looking at the results of programs, we can learn from those efforts as well.

(I make no proposal on what ERS/EN should do.)