

# Policy-Driven Demand for Government Evaluation: Data and Capacity

*Commission on Evidence-Based Policymaking*

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# Cross-Agency Data Linking: Free Application for Federal Student Aid (FASFA)

- HUD provides ED assisted tenant data for matching to Federal Student Aid data.
- Benefits
  - HUD now has national data on one measure of college attendance.
  - Able to conduct rapid-cycle, in-house experiments.
  - Provide aggregated data to PHAs on take up for assisted households.
- Lessons
  - Linked data not located in secured research center with access for HUD or ED staff.
  - *Lack of infrastructure for easy in-house work, or for getting more out of the matches.*



# Cross-Agency Data Linking: HUD & National Center for Health Statistics

- 14 years of HUD data (1996-2014) linked to cross-sectional health survey data.
- Benefits
  - Enables researchers to examine the relationship between assisted housing and factors that influence health status, chronic disease, health care utilization, morbidity, and mortality.
- Lessons
  - CDC research center (linking, securing privacy) is fundamental to supporting work.
  - MOU included cost-free linkage, free RDC access for HUD researchers.
  - Legal barriers due to data privacy concerns were very challenging; MOU took years to negotiate.
- Across both projects: time-consuming, one-off MOUs not the best way forward.



# Census MOUs: IAA with CARRA

- Center for Administrative Records Research and Applications (CARRA) IAA to link data from HUD's tenant databases and select trials with Census' survey data and other administrative data.
- Benefits
  - OMB directed Census to use appropriated funds for these purposes and to administer the Evidence-Based Policymaking Commission.
  - Pilot to support evidence-building and program evaluation.
  - Will greatly increase external researchers' access to HUD administrative and research data, within a secured infrastructure.
- Lessons
  - A sustainable cost structure will need to be developed for broad adoption.
    - *Longer-term costs need a model that does not consume agencies' current research budget.*



# Census MOUs: Joint Statistical Project Agreement

- Joint Statistical Project Agreement (JSPA) commits HUD and Census to partner on linking housing data to non-housing data sources, available for internal researchers at each agency.
- Benefits
  - HUD staff can access linked data remotely from a secured computing environment within PD&R/HUD, for much faster policy/evaluation work.
- Lessons
  - Providing federal research staff access to broad administrative data is a critical piece of driving evidence-based policy.
- Additional Lesson
  - The interplay between data availability and what we study.
    - CARRA linking is already affecting our research agenda.



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# Making the Most of Data within CARRA

## 1. Institutional Review Board guidance to permit indefinite data matching at CARRA.

- MTO data: consent not time restricted, general administrative matching.
- Family Options Data: 5 year consent.
- Lessons
  - It is reasonable to limit the time frame for consent for generic administrative matching.
  - But if the responses are protected by the Census Bureau Title XIII, we are proposing that IRBs be given model language to allow indefinite consent.
    - When impacts take 20 or 30 years to materialize, we need to be sure that we will be able to measure them.



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# Making the Most of Data within CARRA

## 2. State Data

- Non-Federal administrative data is crucial to many studies. State data access varies widely.
- Lessons
  - Consider the role of non-Federal administrative data
    - Chapin Hall pilot, whereby state and local data are being added to CARRA, should be expanded.
    - Any data inventory the Commission creates should include non-Federal data.



# Additional Issues to Consider

## 1. Gathering data and the Paperwork Reduction Act.

- More robust incorporation of data and evidence in Federal policy requires improvements in PRA.
  - Particularly important for HUD – which does not operate its programs directly (Public Housing Agencies = 3,400); state and local governments (1,200); multifamily-owners of assisted properties (20,000); etc.
  - There are various ways this could be done.

## 2. Weakness of Privacy Act Protections.

- Administrative data on which much of these efforts will be built has fairly weak privacy protections under the Privacy Act.
- The Commission could consider recommending strengthening statutory protection for administrative and survey data collected for agencies like HUD.

