

**Comments on Senate Bill No. 788: “An Act Establishing A National Evaluation Policy”, introduced by Senator Risa Hontiveros, and Senate Bill No. 1885: “An Act Establishing A Results-Based National Evaluation Policy”, introduced by Senator Imee Marcos.**

*Prepared by Michael Ralph Abrigo<sup>1</sup>, Jose Ramon Albert<sup>2</sup>, Connie Dacuycuy<sup>3</sup>, Francis Mark Quimba<sup>4</sup>, Aubrey Tabuga<sup>5</sup>, Vicente Paqueo<sup>6</sup>, Marife Ballesteros<sup>7</sup>, and Celia Reyes<sup>8</sup>*

December 16, 2020

Introduction

Senate Bill (SB) Nos. 788 and 1885 laudably recognize the importance of a national evaluation policy (NEP). Amid the growing budgets across government agencies, including those of local government units (in the wake of the Mandanas ruling), and branches of government outside of the executive, evaluation is critical to learning and accountability. A NEP law will also enable stronger enforcement of the development or improvement of M&E units/systems in government agencies. Under the current system, many if not all PAPs (Programs, Activities, and Projects) implemented by government have in place monitoring and evaluation (M&E) units/systems but are usually not functional or underdeveloped.

Although in principle, many, if not all, public policies and programs sound promising as instruments for achieving development outcomes, but in practice, they may not actually work, for a number of reasons, including poor design and implementation, or intervening factors that were not taken into account in the project design. Evaluation is a key tool to answer the basic question whether or not policies, programs, and projects work as intended. Moreover, it is unsure whether M&E reports of agencies systematically lead to changes in the ways PAPs are implemented. M&Es of PAPs tend to be programmatic, rather than system-wide.

The Department of Budget and Management (DBM) together with the National Economic and Development Authority (NEDA), established joint circulars on the NEP framework to guide the conduct of evaluations in the Executive Department. The NEP sets standards for

---

<sup>1</sup> Dr. Michael Ralph Abrigo, Senior Research Fellow, Philippine Institute for Development Studies (PIDS)

<sup>2</sup> Dr. Jose Ramon Albert, Senior Research Fellow, Philippine Institute for Development Studies (PIDS)

<sup>3</sup> Dr. Connie Dacuycuy, Junior Research Fellow, Philippine Institute for Development Studies (PIDS)

<sup>4</sup> Dr. Francis Mark Quimba, Senior Research Fellow, Philippine Institute for Development Studies (PIDS)

<sup>5</sup> Dr. Aubrey Tabuga, Junior Research Fellow, Philippine Institute for Development Studies (PIDS)

<sup>6</sup> Dr. Vicente Paqueo, Distinguished Visiting Research Fellow, Philippine Institute for Development Studies (PIDS)

<sup>7</sup> Dr. Marife Ballesteros, Vice President, Philippine Institute for Development Studies (PIDS)

<sup>8</sup> Dr. Celia Reyes, President, Philippine Institute for Development Studies (PIDS)

evaluations that can guide the government for establishment of necessary evaluation mechanisms, instruments and systems, including data, and carrying out objective and independent evaluations.

### Comments on specific provisions of the proposed bills

1. **On the Declaration of Policy (Sec. 2 of SB 1885; Sec. 1 of SB788):** While both bills provide the rationale for a NEP that is results-based, including definitions of terms, as well as a basic grounding of evaluation activities, they do not situate evaluation as being equity-focused, gender-responsive, and data-driven, which are key to making sure that data is used for inclusive and better development outcomes.
2. **On Coverage (Sec. 5 of SB 1885; Sec. 4 of SB 788):** The coverage suggests that the NEP has a comprehensive, broad and wide ranging concerns that will require different expertise and levels of evaluation as well as a holistic approach to evaluation. This may require a coordination/collaborative approach instead of a centralized approach to a national evaluation system.
3. **On the Evaluation Principles (Sec 6 of SB1885; Sec 5 of SB788):** The evaluation principles and grounding of evaluation slightly vary in the two bills. On one hand, SB 1885 defined evaluation principles under Section 6 as the following: i) adherence to good practices and standards; ii) evaluation ethics; ii) independence of evaluation process; iv) professionalism; and, v) transparency. On the other hand, while SB 788 does not mention independence of the evaluation process, which is extremely important, the SB covers several other critical issues, including capacity building, the evaluation scale, and evaluation reporting that are not discussed in SB 1885.
4. **On Evaluation Design and Execution (Sec. 12 of SB 788):** It is important to be not too specific about what research methodologies to use as these can vary depending on the situation, data availability, and other factors. For instance, using conclusions from systematic reviews or synthesis of findings is highly recommended but specifying this in the policy may constrain the user from using a single but rigorous analysis. There are many instances where an impact evaluation in the strictest sense cannot be done because of many circumstances. The inability to conduct an impact evaluation should not prevent policymakers from using studies that use other methodologies.
5. **On the Creation of the National Evaluation Council and its Functions (Sections 8 and 10 of SB 1885; Sections 14 and 16 of SB 788).** While these legislative measures provide a concrete mechanism for enforcing a NEP through the establishment of a new body, viz, the National Evaluation Council, it is unclear

whether establishing a new body can actually strengthen the current evaluation work being undertaken in government, given capacity and resource issues. The functions as provided in the proposed bills are enormous to be undertaken by a single agency.

- a. There is a concern whether having another council to push for NEP will be effective given the current technical capacities across the bureaucracy regarding evaluation. At multilateral institutions such as the World Bank, Asian Development Bank (ADB), the units that are in charge of evaluations are independent (i.e., the Independent Evaluation Group of World Bank, and the ADB Independent Evaluation Department), with a capacity and budget that cannot be influenced by the mother institutions.

The Congress may want to consider instead establishing independent M&E units in Departments or mother agencies.

- b. The proposed (Results-Based) National Evaluation Policy (RBNEP/NEP) need not be limited to the "legal and institutional framework for the regular conduct of monitoring and evaluation (M&E) of the results of public policies, programs, and projects". The proposed RBNEP/NEP may be an opportunity to harmonize and strengthen policies not only on interim, final, and ex-post monitoring and evaluations (i.e., for ongoing and completed interventions or policies), but also of ex-ante evaluations (i.e., for proposed interventions or policies before implementation). A holistic RBNEP/NEP may need to incorporate in its framework the assessment also of likely outcomes of planned development interventions and its alternatives, like those implemented in environment (i.e., Environmental Impact Assessment as provided for in Administrative Order No. 42, s. 2002), trade (Regulatory Impact Assessment as provided for in RA 11032), and health (Health Technology Assessment as provided for in RA 11223), among others.
- c. Given the need for a holistic approach to RBNEP/NEP, we suggest to include a provision for independent or external evaluators to do impact assessments and more in-depth evaluation. These agencies can also be tapped to do capacity building for the Departments' M&E units. There are existing agencies in government doing independent evaluations (e.g. PIDS, PCED, ILS, etc.) and it would be better to strengthen these agencies, expand their evaluation and capacity building functions and institutionalize a collaborative system amongst them. PIDS can serve as the repository agency of the evaluation studies since the agency is already undertaking such function.

6. **On the creation of Independent Evaluation Units (IEUs) of Covered Entities (Sec. 13 of SB 1885; Sections 19 and 20 of SB 788):** the proposed creation of the IEUs and strengthening thereof of the M&E systems in government departments, agencies and instrumentalities is a pragmatic solution instead of establishing the NEC. These units will support and complement the work of independent external evaluators such as PIDS. The functions of the IEUs as stated in SB788 can be adopted.
7. **On the Utilization and Evaluation Findings (Sec. 14 of SB 1885; Sec. 21 of SB 788):** The most crucial element of the policy is how to ensure the utilization of M&E results in the policymaking process. It would be extremely important to specify in the IRR, if not in the policy, the specific strategy that will be implemented to ensure that policies will benefit from M&E. We highly recommend that the utilization of the M&E results in the policymaking be built into the M&E process as well. The results of such will also have to be made transparent.
8. **On Funding of the RBNEP (Sec. 15 of SB 1885; Sec. 23 of SB 788):** The allocation of a dedicated portion of budget for the IEUs and for external evaluation should be strictly implemented. We suggest to include a provision that will earmark a fixed amount, say 1%, of the total program budget for the conduct of impact and process evaluation annually. The 1% allocation is the usual practice of several countries to ensure proper funding for program evaluation.
9. **Transparency of Data and information under NEP.** We suggest to include as part of the NEP a provision on transparency of data and information at all levels and agencies.

Monitoring and evaluation activities are heavily dependent on transparent data and information. M&E is expensive if the agencies involved in doing it will collect their own new data on a regular basis, although this can be done in some circumstances. It is therefore important for the national evaluation policy to compel all bodies to be transparent with their administrative data (except of course in circumstances that violate the data privacy act) as these can serve as important sources of information in the M&E process. This will require some technical assistance to be given to government workers who will need to process their data, meaning aggregate them into forms that will not divulge unit-level private and sensitive data.

While SB 788 discussed data but only within the purview of its Section 12 on Evaluation Design and Execution, both SBs do not give enough clout for the evaluation to demand available data from the agencies concerned, which often have been reluctant to share data even within their own agencies because of misconstrued interpretations of the Data Privacy Act (particularly the fear of getting imprisoned for sharing any personal data, when actually the Act does not disallow the sharing of personal data, but only requires that personal data is not misused for harming people). Data is the bedrock of evaluation.

Currently, the PIDS has been tasked by Republic Act No. 11310 to evaluate regularly the Pantawid Pamilyang Pilipino Program (4Ps), the largest social assistance program in the country, and it would be vital if the Department of Education can share national achievement test scores of students for purposes of evaluation.

10. For your consideration.