

June 24, 2022

Treasury PRA Clearance Officer
1750 Pennsylvania Ave. NW, Suite 8100
Washington, DC 20220

To whom it may concern:

to address this concern and increase the

Finally, Section 2053 of SIPPRA, Awarding Social Impact Partnerships, sub-section, (c) Agreement authority, describes conditions required for the Federal Government to enter into an agreement for a social impact partnership project. One such condition is, "The Federal payment...for each specified outcome achieved...is less than or equal to the value of the outcome to the Federal Government over a period not to exceed 10 years." Importantly, this does not state the ten-year period must end before any specific date and, therefore, allows Treasury to exu8858 0,8lJeTnest

Additional Evaluation Designs

Treasury's explicit or implied preference for randomized controlled trials (RCTs) during the 2019 NOFA was a major factor for many eligible applicants in deciding not to apply or withdrawing applications. We urge Treasury to allow applicants to use quasi-experimental evaluation designs and other approaches that move government spending toward more evidence-based approaches. RCTs are appropriate when the Food and Drug Administration is assessing the evidence of a new drug or medical device. However, they are simply too high of a bar in this context. Adjusting evaluation requirements will reduce the underlying costs of social impact partnerships and make more projects viable. Importantly, doing so aligns with Section 2055, sub-section (c) Methodologies to be used, which states evaluations can use "other reliable, evidence-based research methodologies."

The previously cited Congressional Research Service report provides numerous resources to guide Treasury in deciding which evaluation designs to allow.³ In addition, the U.S. Government Accountability Office page on Using Data and Evidence to Improve Federal Programs is also helpful.⁷

CONCLUSION

Nemours Children's stands ready to leverage our expertise and relevant experiences to assist Treasury with SIPBRA or other initiatives related to child health and development. Thank you for your consideration of our recommendations, and we look forward to continued collaboration. Please do not hesitate to reach out to Joshua Ogburn, Manager of Policy, at Joshua.Ogburn@nemours.org with questions or requests for additional information.

Sincerely,



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Nemours Children's Health

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