

# Setting the Right Standard: The Need for a Stronger Definition of “Evidence-Based” in the Workforce Innovation and Opportunity Act

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## EXECUTIVE SUMMARY

**The definition of “evidence-based” is critical to ensure workers are well-served and the public receives a strong return on their investment.** Over the past 15 years, federal policymakers have applied numerous different “evidence-based” definitions that govern federal, state and local investments in areas ranging from home visiting to reemployment.<sup>1</sup> These distinct definitions determine which programs and practices can qualify for funding, shape states’ and localities’ planning, and set the stage for ongoing evidence-building and continuous improvement. For example, under the Maternal, Infant, and Early Childhood Home Visiting (MIECHV) program administered by the U.S. Department of Health and Human Services (HHS), states must invest at least three-quarters of dollars in evidence-based approaches supported by rigorous experimental or quasi-experimental research, and any other funded programs must be under evaluation. In comparison, the 2015 Every Student Succeeds Act (ESSA), the last reauthorization of the Elementary and Secondary Education Act (ESEA), includes numerous requirements that states implement “evidence-based” programs, as defined in statute, but often defers to the state to determine the extent to which “such evidence is reasonably available.”

**The definition of “evidence-based” in statute shapes the rigor of evidence on adopted interventions, in turn influencing the expected overall impact and effectiveness of policies.** For example, the relatively loose statutory definition of “evidence-based” under ESSA characterized a broad range of programs as “evidence-based” in the context of formula funding priorities—including some interventions for which the research is only preliminary. In contrast, the Reemployment Services and Eligibility Assessment (RESEA) program has included far more exacting definitions of “evidence-based” to elevate approaches that are research-backed, while also allowing states to implement less-tested but promising approaches so long as they are rigorously evaluated.

**Moving forward, policymakers in Congress and the executive branch could incorporate a more effective evidence-based definition, and related incentives, that drive stronger outcomes under the Workforce Innovation and Opportunity Act (WIOA) and other education and workforce programs.** This policy brief recommends key components of a new WIOA evidence-based definition that could be incorporated into other program areas moving forward, strengthen program impacts, and lead the way for rigorous evidence-building. WIOA is currently a blank slate: there is no governing definition of “evidence-based” for WIOA programs in statute or in regulation. Congress, however, almost changed that last year when it nearly passed a bipartisan, bicameral WIOA reauthorization bill, the A Stronger Workforce for America Act (ASWA). ASWA included numerous promising evidence-based funding provisions alongside a definition of “evidence-based” that was directly aligned with the statutory definition incorporated in 2015’s ESSA.<sup>2</sup>

A new definition can also provide much-needed clarity across the full landscape of federal workforce programs. Currently, the U.S. Departments of Education (ED), Labor (DOL), and HHS each employ distinct evidence-based definitions even though all three agencies administer overlapping workforce programs. **The present situation is at best confusing and at worst untenable – it is as if the agencies are using different yardsticks to measure the same thing, requiring constant re-assessment of practices across agencies and additional compliance burdens for service providers.** A stronger definition could, for example, support implementation of Workforce Pell by helping direct dollars towards programs with demonstrated workforce development impacts. This solution would also support the aligned approach the Trump administration has recently announced under ED, DOL, and the Department of Commerce’s *America’s Talent Strategy*, which calls for the agencies to “explore DARPA-style experimentation to test bold new ideas, evaluate real results, scale proven strategies, and prioritize AI literacy and skill development across the workforce system.”<sup>3</sup>

This publication briefly reviews the current patchwork landscape of federal evidence-based definitions, provides recommendations for a stronger definition under WIOA, and then considers options for implementation. We also provide a sample definition in the appendix, and readers can refer to Results for America’s broader guidance on evidence definitions as well.<sup>4</sup> Recommendations for a new definition of “evidence-based” programs and practices under WIOA include:

- Policymakers should pursue **an aligned evidence-based definition across workforce programs but should not simply adopt the statutory ESSA definition.** The past decade of implementation has demonstrated the importance of taking a more nuanced approach than the statutory ESSA definition governing formula education programs, and in fact over the past decade ED has applied a distinct, enhanced standard for national competitive programs that sets a higher bar. Ideally, moving forward, agencies would adopt a shared tiered structure and common language that can be translated across policy domains and programs and meaningfully incentivizes and rewards programs that demonstrate stronger evidence.

- Policymakers should **take care in crafting distinctions between evidence-based tiers**, including creating meaningful distinctions in funding amounts or flexibility between tiers of evidence to provide real incentives for the field.
- WIOA should incorporate a **complementary “evidence-building program” definition** to better distinguish programs with demonstrated promise and a strong rationale but are not yet as proven as “evidence-based” strategies. This definition offers a critical tool for policymakers to strengthen investments in domains with more limited evidence as well as to continue generating knowledge about why, how and for whom programs work.
- A new evidence-based definition should **consider the full body of evidence**, not just a single study, including the context in which programs are implemented. The definition should also **emphasize relevant, important outcomes**.
- Legislators should **emphasize key points for an evidence-based definition while leaving flexibility for DOL** to implement standards in practice, recognizing both the limitations of statutory language and the need to respond to emerging research methodology in the future.
- Policymakers should **balance simplicity and clarity with rigor, and invest in complementary resources and technical assistance** that make evidence-based practice and evidence-building more accessible for providers and practitioners across the nation.

A more effective evidence-based definition can set the stage for transformative workforce development investments in proven strategies relevant to communities and populations around the country, while also supporting ongoing evidence-building that responds to emerging needs and advances the cutting-edge of practice. Policymakers should ensure that evidence-based provisions are laid on a strong foundation of an effective, versatile, productive evidence-based definition.

## THE PATCHWORK LANDSCAPE OF FEDERAL EVIDENCE-BASED DEFINITIONS

Over the past decade and a half, federal policymakers have established evidence-based definitions in many areas of social policy.<sup>5</sup> Programs adopting distinct definitions include, ESSA’s statutory definition; ED’s regulatory evidence definitions; the RESEA program under DOL; the MIECHV program, the Family First Prevention Services Act (“Family First”), and the Teen Pregnancy Prevention program, as well as the Administration on Children and Families Pathways to Work Evidence Clearinghouse,<sup>6</sup> under HHS; and the Juvenile Justice and Delinquency Prevention Act under the Department of Justice.

These approaches have adopted many similar elements, such as establishing multiple levels of evidence based on the rigor of the underlying research, including distinguishing experimental, quasi-experimental, and correlational research; requiring statistically significant effects; and considering the context in which the program was implemented. However, these definitions also differ in key ways that mean a program that is “evidence-based” under one statute might not qualify under another – such as how many studies are necessary to qualify for an evidence level.

**The evidence definition landscape is particularly confusing in the context of workforce development as multiple federal agencies fund workforce programs but use different evidence standards,** making it challenging for governments and private providers to keep track and imposing additional costs across the system. In fact, ED, DOL, and HHS all have their own evidence clearinghouses including reviews of workforce programs with slightly different focuses and review protocols.<sup>7</sup> Especially as the clearinghouses have historically struggled to review new evidence in a timely manner, this duplication is inefficient; all three clearinghouses have separately reviewed the leading sectoral program Year Up, for example, all noting positive outcomes.<sup>8</sup>

Given that multiple agencies fund workforce programs, ASWA’s approach to try to align WIOA with the now decade-old ESSA evidence-based definition was reasonable. After all, many providers already operate across both the “education” and “workforce” systems, and some programs, such as career and technical education (CTE), explicitly bridge the divide. Indeed, for this reason, Congress also directly linked the “evidence-based” definition in 2018’s Perkins Career and Technical Education Act reauthorization to the ESSA definition.<sup>9</sup>

**However, closer examination reveals that aligning WIOA’s evidence-based definition with ESSA will both cause confusion and impose a sub-optimal standard.** ED has itself recognized the limitations of the statutory ESSA definition, and as a result has applied distinct evidence-based definitions to ESEA formula grants, such as the multibillion-dollar ESEA Title I K-12 funding stream and its school improvement provisions, and to competitive grants, such as the Education Innovation and Research program.<sup>10</sup> We believe it is important to avoid the potential for a similarly-confusing split in the context of WIOA and to set a stronger, single standard across the board.

The definition of “evidence-based” that applies to formula grants directly adopts ESSA’s statutory language and takes a very open-ended approach to defining four evidence levels. This statutory formula definition requires only a single study to qualify a program for the top “strong” evidence level and allows essentially any program to qualify as “evidence-based” under the bottom “demonstrates a rationale” tier so long as the grantee did some kind of ongoing examination (see sidebar).<sup>11</sup> In contrast, ED’s approach to evidence levels under its competitive grants, as outlined in the Education Department General Administrative Regulations (EDGAR) grantmaking rules, is much more precise and adds important qualifications on top of the statutory framework. The competitive grants definitions, for example, require multiple studies (or a multisite study) to qualify a program for the top evidence tier; requires that

studies meet the What Works Clearinghouse research protocols to qualify for the top two tiers; considers studies with negative impacts; and includes only three tiers, omitting the bottom “demonstrates a rationale” tier.

ED’s EDGAR competitive grants framework preceded ESSA’s evidence-based definition, so the Department was tasked with aligning the two approaches.<sup>12</sup> When ED began implementing ESSA in 2016, legal, political and practical considerations weighed against applying the competitive evidence-based framework for formula programs, while ED also wanted to maintain its more rigorous EDGAR standards for competitive grants. In the Department’s most recent non-regulatory guidance on the ESSA evidence definition, it explained the distinction by stating, “The additional detail in EDGAR is necessary for inclusion and use in the Department’s competitive grant programs to be able to differentiate between different evidence levels among applicants when a limited amount of funding is available.”<sup>13</sup>

## THE EVERY STUDENT SUCCEEDS ACT EVIDENCE-BASED DEFINITIONS

### ***Formula Funds Statutory Definition (20 U.S.C. 7801(21))***

“...the term ‘evidence-based’, when used with respect to a State, local educational agency, or school activity, means an activity, strategy, or intervention that — ‘

- 1** (demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on —
  - 1a** strong evidence from at least 1 well-designed and well-implemented experimental study;
  - 1b** (moderate evidence from at least 1 well-designed and well-implemented quasi-experimental study; or
  - 1c** promising evidence from at least 1 well-designed and well-implemented correlational study with statistical controls for selection bias; or
- 2** demonstrates a rationale based on high-quality research findings or positive evaluation that such activity, strategy, or intervention is likely to improve student outcomes or other relevant outcomes; and
  - 2a** includes ongoing efforts to examine the effects of such activity, strategy, or intervention.”

### **Competitive Grants EDGAR Definitions – Example of “Strong Evidence” Definition (34 CFR 77.1)**

“Strong evidence means evidence of the effectiveness of a key project component in improving a relevant outcome for a sample that overlaps with the populations and settings proposed to receive that component, based on a relevant finding from one of the following:

## THE EVERY STUDENT SUCCEEDS ACT EVIDENCE-BASED DEFINITIONS (CONT.)

- 1 A practice guide prepared by the WWC using version 2.1, 3.0, 4.0, 4.1, or 5.0 of the WWC Handbooks reporting “strong evidence” for the corresponding practice guide recommendation;
- 2 An intervention report prepared by the WWC using version 2.1, 3.0, 4.0, 4.1, or 5.0 of the WWC Handbooks reporting “Tier 1 strong evidence” of effectiveness or a “positive effect” on a relevant outcome based on a sample including at least 350 students or other individuals across more than one site (such as a State, county, city, local educational agency (LEA), school, or postsecondary campus), with no reporting of a “negative effect” or “potentially negative effect” on a relevant outcome; or
- 3 A single experimental study reviewed and reported by the WWC most recently using version 2.1, 3.0, 4.0, 4.1, or 5.0 of the WWC Handbooks, or otherwise assessed by the Department using version 5.0 of the WWC Handbook, as appropriate, and that —
  - 3a Meets WWC standards without reservations;
  - 3b Includes at least one statistically significant and positive (i.e., favorable) effect on a relevant outcome;
  - 3c Includes no overriding statistically significant and negative effects on relevant outcomes reported in the study or in a corresponding WWC intervention report prepared under version 2.1, 3.0, 4.0, 4.1, or 5.0 of the WWC Handbooks; and
  - 3d Is based on a sample from more than one site (such as a State, county, city, LEA, school, or postsecondary campus) and includes at least 350 students or other individuals across sites. Multiple studies of the same project component that each meet the requirements in paragraphs (iii)(A) through (C) of this definition may together satisfy the requirement in this paragraph (iii)(D).”

As a result, some programs can qualify under different evidence tiers depending on whether the grantee is using Title I formula funding for school improvement or whether the grantee is pursuing a national competitive grant from the Department of Education. **That is, the standard for “evidence-based” is lower for ESSA formula programs than it is for competitive grants.** In fact, this distinction led to the creation of an evidence database, Evidence for ESSA, hosted by Johns Hopkins University that addresses formula programs; this database is entirely distinct from the Department’s own longstanding What Works Clearinghouse.<sup>14</sup>

### **Policymakers can avoid replicating this confusing situation by pursuing a new path with WIOA.**

In addition, as we discuss in the next section, there are also significant programmatic reasons to craft an evidence-based definition that addresses weaknesses of the ESSA approach.



## A FRAMEWORK FOR A STRONGER EVIDENCE-BASED DEFINITION UNDER WIOA

Moving forward, policymakers can build on lessons learned from ESSA and other federal evidence definitions as well as tremendous progress in the field of social policy research over the past decade. ESSA's implementation efforts have revealed several ways the ESSA “evidence-based” definition could be improved to provide greater clarity to the field, support more intentional evidence-building, and drive funding to stronger practices. **A well-crafted evidence-based definition for WIOA also has the potential to set the stage for alignment across federal programs, or at the very least education and workforce investments.**

Policymakers should also note that DOL has already implemented a reasonable approach to defining “evidence-based” strategies under RESEA in alignment with DOL’s Clearinghouse for Labor Evaluation and Research (CLEAR).<sup>15</sup> However, this definition could be improved with several enhancements as we discuss below, and is also narrowly focused on RESEA program outcomes involving unemployment compensation.

Moving forward, policymakers should incorporate the following features in a reframed evidence-based definition for WIOA:

**Consider the full body of evidence.** The statutory ESSA definition enables cherry-picking by requiring grantees to simply identify “at least one well-designed and well-implemented” study that provides strong, moderate or promising evidence without consideration of the context in which the program was originally implemented. That means that a program with one positive initial study, perhaps published decades ago, could provide “strong evidence” even when a slew of follow-up studies demonstrate null or even negative outcomes, or when the grantee proposes to implement the program in an entirely different setting. The “replication crisis” in psychology, in which subsequent studies failed to replicate many of the most-cited findings in the field, demonstrates the urgent need to consider a program’s full body of evidence, not just a single study.<sup>16</sup>

The limitations of the ESSA statutory definition have had adverse consequences for ESSA’s impact. For example, a 2024 Government Accountability Office report found that while 86% of sampled districts’ comprehensive school improvement plans referenced an evidence-based strategy as required by law, only 58% included at least one intervention supported by a high-quality study reviewed by the federal What Works Clearinghouse—and 18% of plans incorporated interventions demonstrated to be ineffective.<sup>17</sup> As veteran education leaders Nora Gordon, professor at Georgetown University, and Carrie Conaway, former chief strategy and research officer for the Massachusetts Department of Elementary and Secondary Education, noted in a 2020 piece, “Since you can find a study to show just about anything, ESSA’s evidence requirements sadly have turned into compliance exercises for many districts.”<sup>18</sup>

Notably, RESEA's evidence definition does not consider the full body of evidence, including studies with negative findings or differences in context. For WIOA, policymakers could instead:

- **Explicitly require consideration of the weight of the evidence.** For example, the Family First Prevention Services Act's evidence definition requires that "if multiple outcome studies have been conducted, the overall weight of the evidence supports the benefits of the practice."<sup>19</sup> At the very least, policymakers should incorporate a requirement to consider any negative impacts, as does ED's regulatory definition.
- **Recognize the role of context for higher tiers of evidence.** ED's regulatory evidence definitions for competitive national grants include consideration of context, recognizing that what works in one place, for one population, might not work elsewhere. For example, under EDGAR, a grantee can only demonstrate "strong evidence" for a proposed activity through research that involves an "overlapping" population and setting.<sup>20</sup> As Results for America has previously noted, "ESSA's [statutory] definition neither acknowledges the importance of considering a full range of evidence when selecting an intervention nor considers the relevance of the existing evidence to the challenge being addressed."<sup>21</sup>

**Emphasize outcomes of significance.** The ESSA definition simply requires a "statistically significant effect on improving student outcomes or other relevant outcomes," enabling grantees to fish for a single statistically significant result, regardless of its ultimate importance. For instance, a single, short-term positive outcome on a reading measure might provide sufficient evidence even if the program did not ultimately raise reading achievement levels.

This approach also raises concerns of "p-hacking" as, from a statistical perspective, considering more outcomes raises the likelihood that some outcomes appear statistically significant because of chance, not because the program actually had a meaningful impact.<sup>22</sup> And because research journals are more likely to publish positive results, many significant outcomes in standalone studies are potentially the result of p-hacking.<sup>23</sup>

To address these issues, policymakers could:

- **Prioritize relevant, important outcomes.** The definition could specifically emphasize using the most relevant outcomes, as does the Family First definition while providing examples ("validated measures of important child and parent outcomes, such as mental health, substance abuse, and child safety and well-being").<sup>24</sup> The MIECHV evidence-based definition, for example, requires programs to demonstrate significant, sustained outcomes in a defined set of benchmark areas (e.g., maternal and newborn health),<sup>25</sup> while RESEA's focuses on employment and unemployment compensation participation duration.
- **Incorporate methodological corrections to address p-hacking.** While likely too technical for a statutory definition as we discuss below, agencies should consider incorporating methodological corrections to



address p-hacking. The most recent What Works Clearinghouse protocols, for instance, calls for creating a composite finding of any main findings in the same general outcome domain (e.g., reading comprehension).<sup>26</sup>

**Better distinguish between evidence tiers.** Most evidence definitions include distinct “tiers” or “levels” of evidence that can qualify or prioritize programs for different levels of funding, or which might incorporate distinct requirements for accompanying evaluation. Some programs include two (e.g., Family First’s “well-supported” and “supported”); others three (e.g., ED’s regulatory definition with “strong,” “moderate” and “promising” evidence); and four (the ESSA statutory definition, which adds “demonstrates a rationale” to “strong,” “moderate” and “promising”).

First, policymakers should consider restructuring the bottom tiers. Programs can qualify as “evidence-based” under the ESSA statutory definition by providing “promising evidence” that consists of a single correlational study or, at the very bottom tier, a program that “demonstrates a rationale” for its likely impact “based on high-quality research findings” and that “includes ongoing efforts to examine the effects of such activity, strategy, or intervention.” Definitionally, these two lower tiers do not provide causal evidence of impact that an activity actually caused better outcomes, as opposed to suggestive evidence that the program is worthy of future study. Moreover, the ongoing evaluation criterion for “demonstrates a rationale” is incredibly weak and can be met with even the most basic analysis—and the field has treated it as a rubber-stamp requirement.

At the same time, policymakers should encourage grantees to continue building reliable evidence to respond to emerging needs and a changing world. That means encouraging continuous development and evidence generation, not accepting a crystallized set of “evidence-based” approaches—and includes implementation and formative research alongside causal studies. As Project Evident puts it, “Evidence needs to help practitioners figure out what does work—and most importantly, what will work—in their own program contexts.”<sup>27</sup> Policymakers should simply be explicit and clear when an evidence-building approach is allowable or preferred in the context of federal funding.

Second, policymakers should ensure there are real distinctions between the higher evidence tiers (often called “strong” or “moderate” evidence). MIECHV uses only a single “evidence-based” level that sets a higher bar than ESSA’s broad statutory evidence definition; MIECHV’s definition is essentially equivalent to “moderate” evidence under ESSA, requiring a single well-designed and rigorous randomized controlled design or quasi-experimental study.<sup>28</sup> As a result, MIECHV essentially treats all qualifying programs the same with regard to its requirement that states allocate at least 75% of funds to “evidence-based” uses, likely a result of political pressures during the program’s design.<sup>29</sup> However, a broad body of research shows the importance of considering programs’ impacts in multiple locations (either through multiple studies or a single multi-site study), as so many programs that demonstrate powerful outcomes in one setting struggle to replicate and scale.<sup>30</sup>

Moving forward, policymakers could:

- **Leverage a complementary definition of “evidence-building program” alongside strong and moderate “evidence-based” tiers.** Results for America has proposed this approach in its set of universal federal evidence definitions.<sup>31</sup> This approach provides policymakers with clearer tools to encourage both evidence use and building when appropriate, including distinct definitions of “evidence-building programs” and “implementation evidence.” We also propose incorporative formative evidence, such as a pilots, feasibility studies or rapid-cycle evaluation, under “evidence-building” so long as that research is intended to lead to a follow-on causal study. For instance, states’ RESEA investments can meet federal evidence-based requirements if programs are under evaluation at the time of use; states can also use up to 10% of funding to conduct evaluations.<sup>32</sup> DOL in turn provides detailed guidance to states about rigorous impact evaluations that could qualify, while also emphasizing the value of complementary implementation research.<sup>33</sup>
- **Require a stronger body of evidence for higher tiers.** For example, the definition could provide that the “strong evidence” level requires at least two studies (or a large multi-site trial that involves multiple locations), as does the regulatory ED evidence definition. Policymakers could also consider requiring that the highest level of evidence include proof of sustained impact, recognizing relevant timeframes could vary by policy domain. Family First’s highest tier requires that at least one study establish that the practice had a sustained effect for at least one year beyond the treatment.<sup>34</sup> The DOL RESEA definition requires multiple studies to meet the top level of evidence, but does not consider sustained, long-term outcomes.

## GUIDELINES FOR IMPLEMENTATION

Finally, policymakers should consider what role Congress versus DOL should play in defining an evidence-based definition for WIOA. A few guidelines for policymakers include:

**Emphasize key points in statute, but leave flexibility for agency implementation.** ESSA’s statutory definition was overly specific in some ways (e.g., at least one study could qualify a program for the top evidence tier) that ultimately led ED to pursue its dual definition approach. In comparison, for RESEA, Congress simply directed DOL to define for itself what “strong” and “moderate” evidence means; that approach has merit, but also risks ineffective implementation or confusing changes across administrations.

Over the long term, the best balance likely involves Congress specifying key criteria in statute (e.g., how many tiers, considering the weight of the evidence, distinguishing evidence-based from evidence-building), as we outline in our sample evidence-based definition below, while affording the executive branch the flexibility to implement the definition effectively and coherently. Moreover, when major reauthorizations

only occur once a decade at best, policymakers should leave room to accommodate unforeseen changes in the field. For example, while randomized controlled trials are currently considered the “gold standard” of causal evidence, developments in quasi-experimental practice using very large data sets could change the landscape.<sup>35</sup>

**Pursue alignment across agencies and programs.** Ideally, ED, DOL, and HHS would align on a single evidence framework that governs workforce programs. WIOA, as the nation’s central workforce legislation, is an appropriate place for that framework. There is no meaningful programmatic reason that each agency should take a methodologically distinct approach to reviewing evidence from a social sciences perspective, even if agencies might emphasize different key outcomes for different programs (e.g., reading comprehensive versus earnings and employment). Similarly, different methodological standards should not apply to formula or competitive grants: a standard that is too complex to apply to formula programs should raise the same question in the competitive context, and either way causes unnecessary confusion. That said, the timing of reauthorizations makes it challenging to align an ESSA statutory definition with a new WIOA reauthorization.

In the near term, one option is to encourage DOL to align its WIOA evidence-based definition with ED and HHS to the extent possible in the future—for instance, the agencies could take similar approaches to very technical issues like reviewing attrition rates. At the very least, DOL can ensure alignment across any WIOA and RESEA definitions (and its CLEAR evidence clearinghouse).

**Balance clarity and simplicity with rigor.** Policymakers in Congress and DOL should also recognize the importance of balancing clarity and simplicity of evidence guidelines with rigor that advances effective evidence-based practice and evidence-building. State and local leaders unfamiliar with research methodology struggled to understand even the relatively barebones statutory ESSA evidence requirements during the first few years of implementation.<sup>36</sup> This might also mean policymakers must invest in complementary technical assistance and quick-turnaround evidence reviews to facilitate strong decision-making. Congress or DOL could follow the lead, for instance, of MIECHV and Family First by requiring agency clearinghouses to provide initial reviews of relevant evidence in advance of its use for WIOA evidence-based practice requirements.

**DOL could create a WIOA standard.** In the absence of WIOA reauthorization, DOL could also consider creating its own administrative “evidence-based” and “evidence-building program” definitions for national WIOA programs and other workforce investments, aligned with CLEAR and RESEA to the extent possible to create a single DOL standard. Legislators could also consider ways to encourage DOL to do so through other means, such as appropriations report language governing WIOA national programs. DOL should leverage these definitions to encourage both stronger impacts as well as promoting continuous improvement and learning through federal workforce development funding.

## CONCLUSION

Evidence-based definitions provide a critical foundation for policymakers to shape the implementation and effectiveness of federal programs, including WIOA. As policymakers consider ways to improve the effectiveness of WIOA investments and bolster the evidence base of workforce programs, they should ensure they leverage a strong, aligned evidence-based standard to guide decision-making across the country for years to come.

Policymakers should also recognize that an effective evidence-based definition is a critical starting point, but insufficient to drive transformative improvement. Simply employing evidence-based requirements or priorities in legislation or regulation is not enough to shift practice. Policymakers must provide systematic incentives for the use and development of evidence-based strategies. They must also provide more extensive supports for the implementation and building of evidence, such as expanding providers' access to administrative data to track program outcomes; investing in the federal clearinghouses that review and synthesize evidence; ensuring research and evaluation is an allowable use of federal funds; and providing high-quality guidance and technical assistance to empower strong learning and evaluation. As forthcoming policy briefs will detail, policymakers now have the opportunity to restructure WIOA's formula and national programs to deepen investment in evidence-based approaches while building relevant research on practices of importance to communities and populations around the nation.

## APPENDIX: SAMPLE EVIDENCE-BASED DEFINITION

- 1| EVIDENCE-BASED. The term “evidence-based” when used with respect to any program, activity, or practice funded under this Act:
  - Means an intervention, program, activity, or practice that has demonstrated the ability to achieve a substantial, sustained statistically-significant, positive impact on important outcomes relevant to policy and/or practice (e.g., participant earnings gains at least one year after exiting the program) and in a typical community setting, in light of the full body of evidence on the intervention.
    - » Strong evidence—An intervention is supported by a strong level of evidence in the context of its proposed implementation if the intervention:
      - » Has demonstrated such positive impacts in the context of at least 2 well-designed, well-implemented experimental studies, or 1 large, multi-site experimental study; except that—
        - Quasi-experimental studies equivalent in rigor to well-implemented, well-designed experimental studies may, if demonstrated in peer-reviewed, widely-accepted research, at the Secretary's discretion, qualify for this criterion.

- › Has demonstrated such positive impacts in a similar setting and for a similar population as proposed.
  - » Moderate evidence—An intervention is supported by a moderate level of evidence in the context of its proposed implementation if the intervention:
    - › Has demonstrated such positive impacts in the context of at least one well-designed experimental study, or 1 quasi-experimental study capable of drawing causal conclusions about the effectiveness of such intervention.
    - › Has demonstrated such positive impacts in a similar setting and/or similar population as proposed.
- (B) Shall be interpreted by the Department, to the extent feasible, to pursue alignment with similar definitions of “evidence-based” issued by the Department and other federal definitions governing education and workforce programs.

**2 | EVIDENCE-BUILDING PROGRAM.** The term “evidence-building program” when used with respect to any program, activity, or practice funded under this Act:

- Means an intervention, program, activity, or practice that —
  - » Has demonstrated the potential to achieve positive effects on important outcomes relevant to policy and/or practice through a reasonable hypothesis and:
    - › credible research findings (such as a correlational study with statistical controls for selection bias);
    - › a descriptive study (such as a case study);
    - › or an evidence review and needs assessment, and
  - » Will be rigorously evaluated, either by a well-designed and well-implemented experimental or quasi-experimental evaluation or by a formative evaluation (e.g., pilot, feasibility study, rapid-cycle evaluation) designed to lead to a follow-on causal evaluation.
- Shall be interpreted by the Department, to the extent feasible, to pursue alignment with similar definitions of “evidence-based” issued by the Department and other federal definitions governing education and workforce programs.

## ABOUT America FORWARD

America Forward is a national nonpartisan policy and advocacy organization that unites our nation's leading social entrepreneurs with policymakers to advance a public policy agenda that fosters innovation, rewards results, and catalyzes cross-sector partnerships to expand opportunity for all. America Forward leads the America Forward Coalition, a network of 100+ of the nation's most impactful and innovative non-governmental organizations that develop and advocate for more effective public policies to advance opportunity and move all of America forward. Since its founding more than 15 years ago, America Forward has emphasized the importance of evidence-based approaches and continued evidence-building across policy domains, including education and workforce development.

## ABOUT RESULTS FOR AMERICA

Results for America (RFA) is a bipartisan, national nonprofit organization that helps government leaders use evidence and data to accelerate results and improve lives. RFA's mission is to make investing in what works the "new normal," so that government decision-makers use evidence and data to use government resources effectively. Since 2012, RFA has shifted more than \$498 billion in government funds toward proven programs and trained over 14,000 government and community leaders.



## ENDNOTES

- 1 See a thorough review from Results for America. Results for America (2024), “Federal, State and Local Evidence Definitions,” [https://results4america.org/wp-content/uploads/2025/04/Results-for-America\\_Federal-State-and-Local-Evidence-Definitions\\_040125-1.pdf](https://results4america.org/wp-content/uploads/2025/04/Results-for-America_Federal-State-and-Local-Evidence-Definitions_040125-1.pdf).
- 2 See H.R. 6655 (118th Congress), <https://www.congress.gov/bill/118th-congress/house-bill/6655/text>.
- 3 Departments of Commerce, Education, and Labor (2025), America’s Talent Strategy, <https://www.dol.gov/newsroom/releases/osec/osec20250812>.
- 4 Results for America (2024), “Results for America’s Evidence Definitions,” <https://results4america.org/tools/results-for-americas-evidence-definitions/>.
- 5 Results for America (2024), “Results for America’s Evidence Definitions,” <https://results4america.org/tools/results-for-americas-evidence-definitions/>.
- 6 The Pathways to Work Clearinghouse focuses on interventions relevant to the Temporary Assistance for Needy Families (TANF) program. See Administration on Children and Families (2020), “Protocol for the Pathways to Work Evidence Clearinghouse,” <https://pathwaystowork.acf.gov/publication/ProtocolPathways>.
- 7 The clearinghouses’ protocols differ in small but important ways that mean study reviews are not interchangeable. For example, DOL’s clearinghouse allows quasi-experimental studies to meet its top evidence rating, while such studies are only eligible for a lower rating under ED’s What Works Clearinghouse.
- 8 See DOL’s Clearinghouse for Labor Evaluation and Research (2014), “Sustained gains: Year Up’s continued impacts on young adults’ earnings (Roder & Elliot 2014),” <https://clear.dol.gov/study/sustained-gains-year-%E2%80%99s-continued-impacts-young-adults%E2%80%99-earnings-roder-elliott-2014>; Pathways to Work Evidence Clearinghouse, “Year Up,” <https://pathwaystowork.acf.gov/intervention-detail/355>; What Works Clearinghouse, “Year Up,” <https://ies.ed.gov/ncee/WWC/InterventionReport/722>.
- 9 Specifically, the Perkins reauthorization provides: “The term “evidence-based” has the meaning given the term in section 8101(21)(A) of the Elementary and Secondary Education Act of 1965.” See 20 U.S.C. 2301(23).

- 10 See page 13, U.S. Department of Education (revised September 28, 2023), *Non-Regulatory Guidance: Using Evidence to Strengthen Education Investments*, <https://www.ed.gov/media/document/non-regulatory-guidance-using-evidence-strengthen-education-investments-2023-46305.pdf>.
- 11 Notably, ESSA's school improvement provisions exclude the "demonstrates a rationale" level from its definition of "evidence-based." 20 U.S.C. 7801(21)(B).
- 12 For disclosure, the author helped coordinate this evidence-based implementation effort during his tenure at the Department of Education.
- 13 U.S. Department of Education (revised September 28, 2023), *Non-Regulatory Guidance: Using Evidence to Strengthen Education Investments*, <https://www.ed.gov/media/document/non-regulatory-guidance-using-evidence-strengthen-education-investments-2023-46305.pdf>.
- 14 See "Evidence for ESSA," <https://www.evidenceforessa.org/>.
- 15 See page 9 to 10 in U.S. Department of Labor (2020), "Expectations for States Implementing the Reemployment Service and Eligibility Assessment (RESEA) Program Requirements for Conducting Evaluations and Building Program Evidence," Unemployment Insurance Program Letter No. 01-20, <https://www.dol.gov/agencies/eta/advisories/unemployment-insurance-program-letter-no-01-20>. See also U.S. Department of Labor (2022), "CLEAR Causal Evidence Guidelines, Version 2.2," available at <https://clear.dol.gov/reference-documents/causal-evidence-guidelines>.
- 16 See Open Science Collaboration (2015), "Estimating the reproducibility of psychological science," *Science* 349(6251), available at <https://www.science.org/doi/full/10.1126/science.aac4716>.
- 17 U.S. Government Accountability Office (2024), *K-12 Education: Education Could Enhance Oversight of School Improvement Activities*, <https://www.gao.gov/products/gao-24-105648>. Similarly, a 2024 study of a large school district found that most of the district's formula-funded school improvement investments would qualify under ESSA's single study requirement – but that many of those investments were not ultimately supported by a wider body of evidence. Ginsberg et al. (2024), "Does ESSA Assure the Use of Evidence-Based Educational Practices," *Educational Policy* 38(1): 161-185, <https://journals.sagepub.com/doi/10.1177/08959048221127989>.
- 18 Gordon and Conaway (2020), "To Broaden Evidence Use Beyond the Federal Law's Requirements, Use Common Sense," <https://www.educationnext.org/to-broaden-evidence-use-beyond-the-federal-laws-requirements-use-common-sense/>.

- 19** Social Security Act, Sec. 471(e)(4)(c)(ii)
- 20** 34 CFR 77.1.
- 21** Results for America (2024), *Redefining Evidence in Education: A Comparison of Results for America's New Evidence Definitions & the Every Student Succeeds Act*, [http://results4america.org/wp-content/uploads/2024/05/RFA\\_Redefining-Evidence-in-Education\\_5.30.24a.pdf](http://results4america.org/wp-content/uploads/2024/05/RFA_Redefining-Evidence-in-Education_5.30.24a.pdf).
- 22** See Yokum and Bowers (2024), "The Value of Pre-Analysis," in *Next Generation Evidence*, Brookings Institution Press, available at <https://projectevident.org/next-generation-evidence-the-book/>.
- 23** Buck (2020), "Escaping science's paradox," *Works in Progress*, 2, <https://worksinprogress.co/issue/escaping-sciences-paradox/>.
- 24** 42 U.S.C. 711(e)(4)(C)(iii).
- 25** 41 USC 711(d)(3)(A)(i)(I).
- 26** See Institute of Education Sciences (2022), *WWC Version 5.0 Procedures and Standards Handbook*, <https://ies.ed.gov/ncee/wwc/handbooks>.
- 27** Brooks, Boulay, and Maynard (2019), *Empowering Practitioners to Drive the Evidence Train: Building the Next Generation of Evidence*, Project Evident, [https://projectevident.org/wp-content/uploads/2022/09/EmpoweringPractitionerstoDrivetheEvidenceTrain\\_BuildingtheNextGenerationofEvidence.pdf](https://projectevident.org/wp-content/uploads/2022/09/EmpoweringPractitionerstoDrivetheEvidenceTrain_BuildingtheNextGenerationofEvidence.pdf).
- 28** 42 U.S.C. 711(d)(3)(A)(i)(I).
- 29** Haskins and Margolis (2015), *Show Me the Evidence*, Brookings Institute Press.
- 30** See, e.g., Al-Ubaydli, List, and Suskin (2019), "The Science of Using Science: Towards an Understanding of the Threats to Scaling Experiments," NBER Working Paper #25848, <https://www.nber.org/papers/w25848.pdf>.
- 31** Results for America (2024), "Results for America's Definitions of 'Evidence-Based Program' and 'Evidence-Building Program,'" [http://results4america.org/wp-content/uploads/2024/02/RFA\\_Definitions-Evidence-Programs.pdf](http://results4america.org/wp-content/uploads/2024/02/RFA_Definitions-Evidence-Programs.pdf).

- 32** 42 USC 506(d).
- 33** U.S. Department of Labor (2019), “Expectations for States Implementing the Reemployment Service and Eligibility Assessment (RESEA) Program Requirements for Conducting Evaluations and Building Program Evidence,” Training and Employment Guidance Letter No. 06-19, <https://www.dol.gov/agencies/eta/advisories/training-and-employment-guidance-letter-no-06-19>.
- 34** 42 U.S.C. 671(e)(4)(C)(v)(II).
- 35** See, e.g., Miklasz, Mays Green, and Levine (2024), “Noggin: Learning Impact Evidence in a Multimedia Children’s Platform,” in *Next Generation Evidence*, Brookings Institution Press, available at <https://projectevident.org/next-generation-evidence-the-book/>.
- 36** Renter, Kober, and Braun, *State Leader Interviews: How States Are Responding to ESSA’s Evidence Requirements for School Improvement*, Center on Education Policy, available at <https://eric.ed.gov/?id=ED597203>. For example, a 2019 GAO survey of ESSA school improvement noted that most states reported selecting evidence-based interventions to be “moderately/very challenging.” Reproduced in U.S. Government Accountability Office (2024), *K-12 Education: Education Could Enhance Oversight of School Improvement Activities*, <https://www.gao.gov/products/gao-24-105648>. See also Farrell, Penuel, and Davidson (2022), “‘What Counts’ as Research? Comparing Policy Guidelines to the Evidence Education Leaders Report as Useful,” *AERA Open*, 8, <https://journals.sagepub.com/doi/10.1177/23328584211073157>.