



May 11, 2026

Mr. Matthew Cook
SIPPRAs Program Director
Office of Economic Policy
U.S. Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, DC 20220

Re: Agency Information Collection Activities; Proposed Collection; Comment Request; Social Impact Partnerships to Pay for Results Act (SIPPRAs) Program Review (OMB Control Number 1505-0260; 91 FR 11599)

Dear Mr. Cook:

On behalf of America Forward, I am writing in response to the Department of the Treasury's notice inviting public comment on the draft FY26 Notice of Funding Opportunity (NOFO) and associated information collection under the Social Impact Partnerships to Pay for Results Act (SIPPRAs). We appreciate Treasury's continued commitment to engaging stakeholders as it prepares to launch a third round of SIPPRAs projects, and its leadership of this critical program.

America Forward leads [the America Forward Coalition](#), a network of more than 100 of the nation's most impactful and innovative non-governmental organizations. We work together to develop, advance, and implement more effective policies that increase opportunity for all ranging from early learning to workforce development. Innovative financing of evidence-based programs is a top priority for the America Forward Coalition, and we have long supported the creation and effective implementation of SIPPRAs. In fact, most SIPPRAs projects to date have involved at least one America Forward Coalition member.

Our comments emphasize the following points:

- We recommend that Treasury retain key clarifications about the outcomes period and savings structure in the final NOFA.
- We appreciate Treasury's efforts to streamline evaluation requirements and leveraging Bayesian approaches, and recommend more flexibility regarding statistical significance levels and clarity regarding use of quasi-experimental methods.
- We suggest a minor clarification regarding Treasury's evidence definitions.
- We suggest Treasury explicitly recognize three additional outcomes for workforce development projects: benefits receipt, recidivism, and financial stability.
- We urge Treasury to facilitate projects' access to administrative data and not to penalize applicants that do not yet have access to such data, but have reasonable plans to do so.
- We support a shorter application timeline to allow more time for project implementation, so long as Treasury can streamline the application and review process and provide greater clarity around the full proposal timeline, and appreciate Treasury's language allowing

applicants to apply with processes instead of particular partners with finalized agreements.

BIA and Savings Methodology

We appreciate several important clarifications in the proposed NOFA and encourage Treasury to retain them in the final NOFA:

- *Outcomes period.* The draft reads, “if an outcome has been met, Treasury will provide payment based on the demonstrated value of the outcome to the federal government over the entire valuation period, which may extend beyond the period of performance in order to show the projected value of an outcome for up to 10 years.” This clarification is an important change from the first NOFA and reflects the importance of investing in programs that can provide long-term, durable outcomes.
- *Savings clarification.* We deeply appreciate the clarification that “Over the course of the period of performance, the project must provide savings to the State *or* local government *or* to the federal government, in the form of reduced outlays” (emphasis added). This approach properly aligns with the statute’s text and intent.

Evaluation

We appreciate Treasury’s continued efforts to clarify and streamline its discussion of the evaluation methodology requirements, as well as its inclusion of Bayesian approaches.

We also appreciate Treasury’s clarification that “The choice of how to best calculate standard errors and confidence intervals is left to the independent evaluator, who must follow best practices based on the identification strategy submitted in the application.” Along those lines, while we appreciate Treasury’s recognition that a higher confidence interval than 80 percent is inappropriate to the purpose of SIPPPRA and could reduce accessibility for a wide array of communities (e.g., rural communities with smaller potential sample sizes), **we encourage the Department allow greater flexibility for the appropriate percentage and, if necessary, leverage payment terms and scoring of the evaluation methodology as opposed to entirely excluding projects proposing a level below 80 percent.**

In addition, we appreciate Treasury’s recognition that quasi-experimental methods may be appropriate for many SIPPPRA projects, and **we encourage Treasury to provide additional clarification regarding the use of quasi-experimental methods when randomization is not feasible.** Treasury should highlight potential examples such as:

- The program is not sufficiently oversubscribed to provide a large enough sample size for random assignment
- Economic considerations weigh in favor of a quasi-experimental design in light of the cost of randomization
- The nature of the project’s implementation poses significant challenges in terms of the administration of randomization or the likely administrative burden on implementers

Recognizing the SIPPPRA statute’s language on this point, we urge Treasury to provide further clarity on quasi-experimental methods to ensure the program is broadly accessible (and again, in particular for rural communities with smaller populations and administrative capacity). We also

note that new quasi-experimental methods promise to leverage administrative data to provide powerful evidence that rivals RCTs – and may in fact provide stronger external validity.¹

Evidence Standard

Treasury’s approach to evidence standards broadly aligns with common practice and our recommended approach in a recent policy brief on ways to design a more effective “evidence-based” definition for the purpose of education and workforce programs.²

However, we note that Treasury’s proposed definition of “moderate evidence” includes this option: “(3) Correlational research with strong statistical controls for selection bias and for discerning the influence of internal factors.” Under most evidentiary frameworks, correlational research that does not constitute a quasi-experimental study would not qualify as “moderate” evidence but instead as promising or preliminary.

Workforce Development

We appreciate Treasury’s intent to emphasize workforce development programs in the third round, recognizing that only one workforce project has been funded so far and that additional projects would help Treasury achieve SIPPRAs’ mission as a demonstration project.

We suggest that Treasury explicitly recognize additional potential outcomes for these programs to encourage applicants for the third round, including several explicitly named in the SIPPRAs statute at Section 2052(b) of the Social Security Act:

- **Benefits receipt.** We expect many programs serving people with low incomes will achieve this outcome: “(4) Reducing the dependence of low-income families on Federal means-tested benefits.”
- **Outcomes for individuals with disabilities.** In addition to Treasury’s reference to individuals receiving Federal disability benefits, we suggest explicitly referencing “(20) increasing the independence and employability of individuals who are physically or mentally disabled.”
- **Recidivism.** This is an important outcome for many workforce programs, including those supported by the longstanding Reentry Employment Opportunities program at the Department of Labor: “(14) Reducing recidivism among juvenile offenders, individuals released from prison, or other high-risk populations.”
- **Financial stability.** This is a critical benefit of successful workforce programs: “(19) Increasing the financial stability of low-income families.”
- **Multigenerational benefits.** In addition to financial stability, we suggest that Treasury also recognize that many workforce development programs may have positive multigenerational benefits as households improve their economic well-being. These outcomes include many already outlined in the SIPPRAs statute, such as “(7) improving birth outcomes and early childhood health and development among low-income families

¹ See Social Finance (2025), “Using Big Data to Understand What Works: Measuring the Impact of Workforce Training with Matching Methods,” <https://socialfinance.org/insight/data-impact-workforce-training-methods/>.

² See Sackett (2026), *Setting the Right Standard: The Need for a Stronger Definition of “Evidence-Based” in the Workforce Innovation and Opportunity Act*, America Forward and Results for America, <https://www.americaforward.org/wp-content/uploads/2026/01/AMFW-RFA-Setting-the-Right-Standard-January-2026.pdf>.

and individuals,” “(13) reducing the number of children returning to foster care,” and “(17) improving the educational outcomes of special-needs or low-income children.”

- **Earnings for other populations.** In addition to individuals 16 to 24 years old and those who have been unemployed or not participating in the labor force for more than 6 months, as Treasury references, we encourage Treasury to recognize the importance of earnings and employment gains for people with low or moderate incomes more broadly, including “individuals with a barrier to employment” as defined by the Workforce Innovation and Opportunity Act (WIOA).³

Access to Data

As Treasury recognizes, access to relevant data is essential to strong evaluation, and the new “access to data” scoring criterion provides a measure of the feasibility of the evaluation’s effective implementation.

However, we are concerned that the federal government has shifted the burden to applicants with regard to data. Treasury writes, “The SIPPRAs statute requires that the Interagency Council certify that the independent evaluator has access to federal administrative data to conduct the independent evaluation.[27] If the Applicant requires federal administrative data, the Panel will assess whether it has access to all relevant data or whether there are gaps in their assumptions.”

Treasury should take two actions to broaden access to SIPPRAs:

- **Provide a clear accounting of relevant data that is accessible to applicants.** It is very challenging for applicants to properly make “assumptions” without understanding what is available. In this case, because Treasury is emphasizing workforce programs in round 3, it could focus on that subset of data as opposed to the entire universe of administrative data relevant to SIPPRAs projects.
- **Affirmatively support applicants’ access to data.** We encourage Treasury and its partner federal agencies on the Interagency Council to take this opportunity to broaden applicants’ access to administrative data. This should include, for example, IRS data (e.g., leveraging the new Secure Query Service initiative) and earnings and employment data under the National Directory of New Hires (NDNH), as well as Medicaid and Medicare data. Pre-established data sharing agreements, for instance, would help facilitate SIPPRAs projects as well as the broader universe of evidence-building and evidence-based projects.
 - This approach would align with the recent *America’s Talent Strategy* issued by the Departments of Labor, Education, and Commerce that states, “All three Departments will identify opportunities to unify federal education and workforce data systems and establish a federal initiative that analyzes opportunities for coordination across longitudinal databases, P-20 data sources, administrative wage records, and related programs.”⁴

³ 29 U.S.C. § 3102(24).

⁴ See page 17 at

<https://www.dol.gov/sites/dolgov/files/OPA/newsreleases/2025/08/Americas-Talent-Strategy-Building-the-Workforce-for-the-Golden-Age.pdf>.

- It would also advance the President’s April 23, 2025, Executive Order “Preparing Americans for High-Paying Skilled Trade Jobs of the Future” which emphasizes the importance of improving transparency into performance outcomes of federal workforce programs “including earnings and employment data.”⁵

Accordingly, we also suggest that Treasury’s data scoring criterion reflect the reasonableness of applicants’ approach to using data, not merely their *present* access to data in advance of actually beginning a project. This approach would also align with Treasury’s proposed flexibility around partner identification.

Implementation Requirements and Timeline

On that note, we appreciate Treasury’s language allowing applicants to apply with processes instead of particular partners with finalized agreements, recognizing the typical timelines and procedures for such arrangements.

Regarding Treasury’s question about the application timeline: we support a shorter response window for applications to allow more time for implementation, but only if Treasury can substantially simplify the application itself. Treasury should, for instance, reduce page lengths and character limits; require only a summary of draft partnership agreements instead of full agreements; and require only a summary of the evaluation approach instead of a full evaluation plan, which should be conducted following the award with the opportunity to incorporate Treasury feedback prospectively. **We also strongly encourage Treasury and its Interagency Council partners to accelerate the review process and provide a specific anticipated timeline for application review, Q&A, and contract finalization.**

Conclusion

We deeply appreciate Treasury’s intentional, thoughtful approach to the SIPPR program and its incorporation of public input into this final third round. We look forward to continuing to support the SIPPR program.

Thank you,

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⁵ See section 5 at <https://www.whitehouse.gov/presidential-actions/2025/04/preparing-americans-for-high-paying-skilled-trade-jobs-of-the-future/>.