



Evaluation of public policies and programs vs performance audit

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Cour des comptes (France)



The 2008 constitutional reform gives the French “Cour des comptes” the mandate to assist both Parliament and Government in the evaluation of public policies

The Court now has four main missions, intrinsically chained together, which yet do not merge :

- **Jurisdictional control over public accountants;**
- **Public accounts certification, directly or via synthesis of third party certifications;**
- **Compliance and performance audits of management of public funds, entities and actions, and:**
- **Public policy evaluation.**



The French Government and Parliament make a strict distinction between audit and evaluation

PROFESSIONAL STANDARDS of the Cour des comptes (Dec. 2017,extract)

I- Missions of the Cour des Comptes...

Public Policy Evaluation:

- “1.5. - Public policy evaluation by the *Cour des Comptes* aims to assess its results and impacts as well as the causal relations explaining them. This assessment addresses the coherence, effectiveness, efficiency, relevance and usefulness of the public policy.**
- I.6. - The evaluation is conducted in an independent, objective and documented way; it involves the main stakeholders.**
- I.7. - The purposes of public policy evaluation are to enable the Parliament and the Government to make considered decisions and to inform citizens.”**



AN HISTORICAL BACKGROUND OF INTOSAI KSC EWG

- 6th INTOSAI KSC Cairo, 15 October 2013**
- EWG meeting, Paris, June 15th, 2015**
- INCOSAI Abu Dhabi December 2016**



Key points of the evaluation guideline in preparation-15/10/2013- (1)

1- Similarity between performance audit/ evaluation:

- To go beyond the compliance audit, to measure the links between public measures and policies and their effects on the environment
- To assess the “added value” of public policies
- Some differences to deepen :
 - Goal of the evaluation is different : evaluation wonders if the adequate instruments were set up to reach some objectives and “in fine” if the objectives of the public decisions were worthwhile...
 - whereas performance audit focuses on the efficiency and effectiveness between public decisions and actions and their intended effects
- An unavoidable “cross fertilization” between those two approaches



Key points of the evaluation guideline in preparation -15/10/2013- (2)

2- Choice of the object of evaluation :

- the scope of the evaluation is (or may be) broader than the one of performance audit because its goal is to assess a wide range of actions contributing to a public objective

3- Methodology :

- The evaluation shall address direct and also indirect effects of public decisions ; it shall also wonder if there are some undesirable effects and to what extent a program or a policy can affect other public measures
- The evaluation shall “ab initio” and “ex post” take into account the point of view of the stakeholders of a policy and therefore define a process which associates them and allows them to intervene



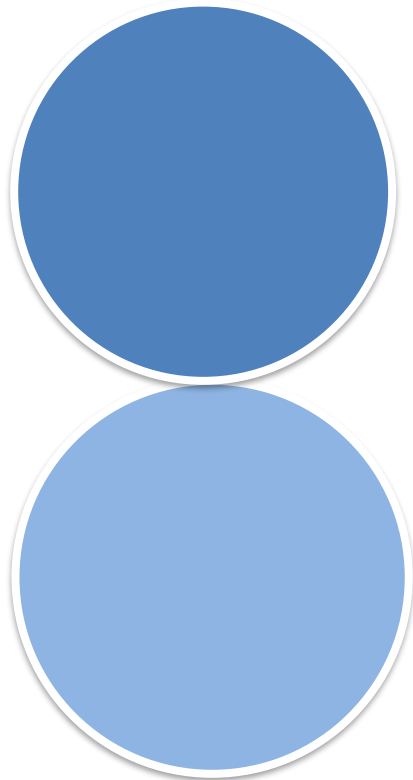
QUESTIONS RECEIVED :

Q : is evaluation a specific form of audit or a branch of performance audit ?

- **A : ISSAI 3000 clearly states that « performance auditing examines the economy, the efficiency and the effectiveness of government programs and organizations ». And it also defines effectiveness as the achievement of the policy objectives**
- **But it also says that a performance audit will *not necessarily* seek to reach conclusions on all three aspects ; and that the objectives *should* be the starting point for performance auditing,**
- **Instead, the relationship between outputs and outcomes, on the one hand, outcomes and policy objectives, on the other hand, is the *core* of program evaluation, as well as the question of the relevancy and the consistency of the objectives**
- **No matter how program evaluation is specific (completely or partially), the subject is to deepen its distinctive features**

Four ways of thinking the relation between Performance audit and Evaluation

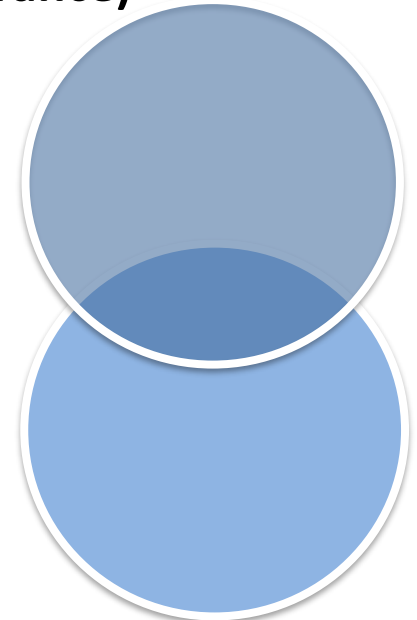
1. Evaluation is different from performance audit



2. Evaluation is just a sub-division of performance audit...
...or 3. the reverse



4. Evaluation differs with performance audit but has overlaps in methodology (France)



Performance audit



Evaluation

June 15th, 2015



GUIDELINES GOV 9400 / FROM EWGP TO EWGPPP

- The transition from program evaluation to policy evaluation occurred during discussions among the EWG.
 - Public policy evaluation refers to broader concepts than performance audit. It includes non-programmatic components, such as regulatory initiatives, soft law, etc., the EWG thought it would add more value to focus on policies.
- In **December 2016**, the guidelines GOV 9400 were approved in Abu Dhabi by INCOSAI and in **November 2017**, the name of EWG has been officially changed from “Working group on program evaluation” into “Working Group on Evaluation of Public Policies and programs”

N.B.: this enlargement doesn't modify the boundaries between evaluation of public policies and political interference, which should not be crossed by an evaluator under any circumstances.



WHAT IS EVALUATION?

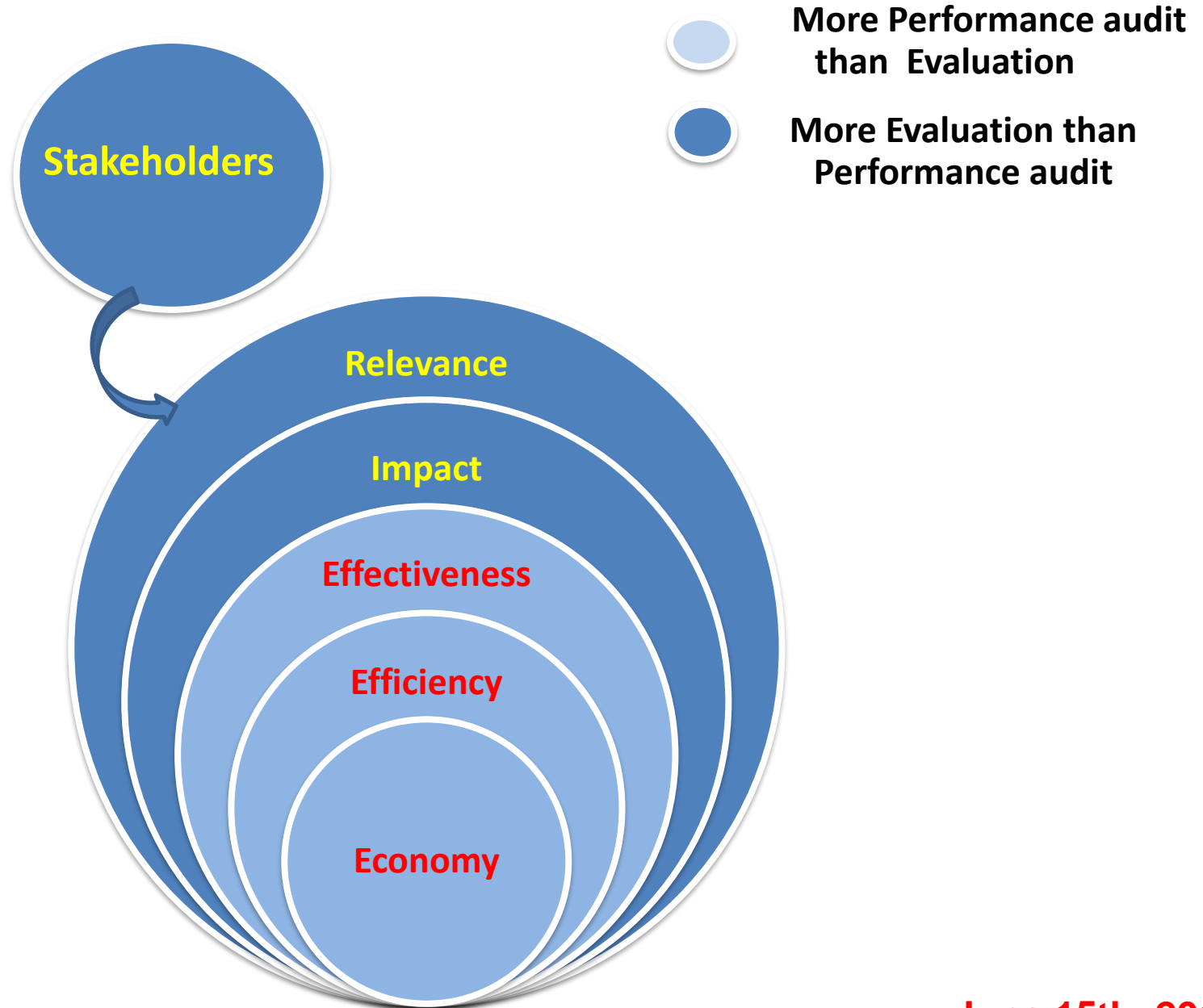


DEFINITION OF THE EVALUATION OF PUBLIC POLICY BY INTOSAI

INTOSAI GOV 9400 – GUIDELINES ON THE EVALUATION OF PUBLIC POLICIES

- The objective of an evaluation is to analyze neutrally and independently the different criteria enabling an assessment of the utility of a public policy (without focusing on a specific administrative unit).
- Typical features of evaluation include mixing together scientific research methods, examining the role of the different public authorities involved as well as civil society actors, and including them in the assessment process systematically.

Evaluation as presented on the methodological guidelines (1)



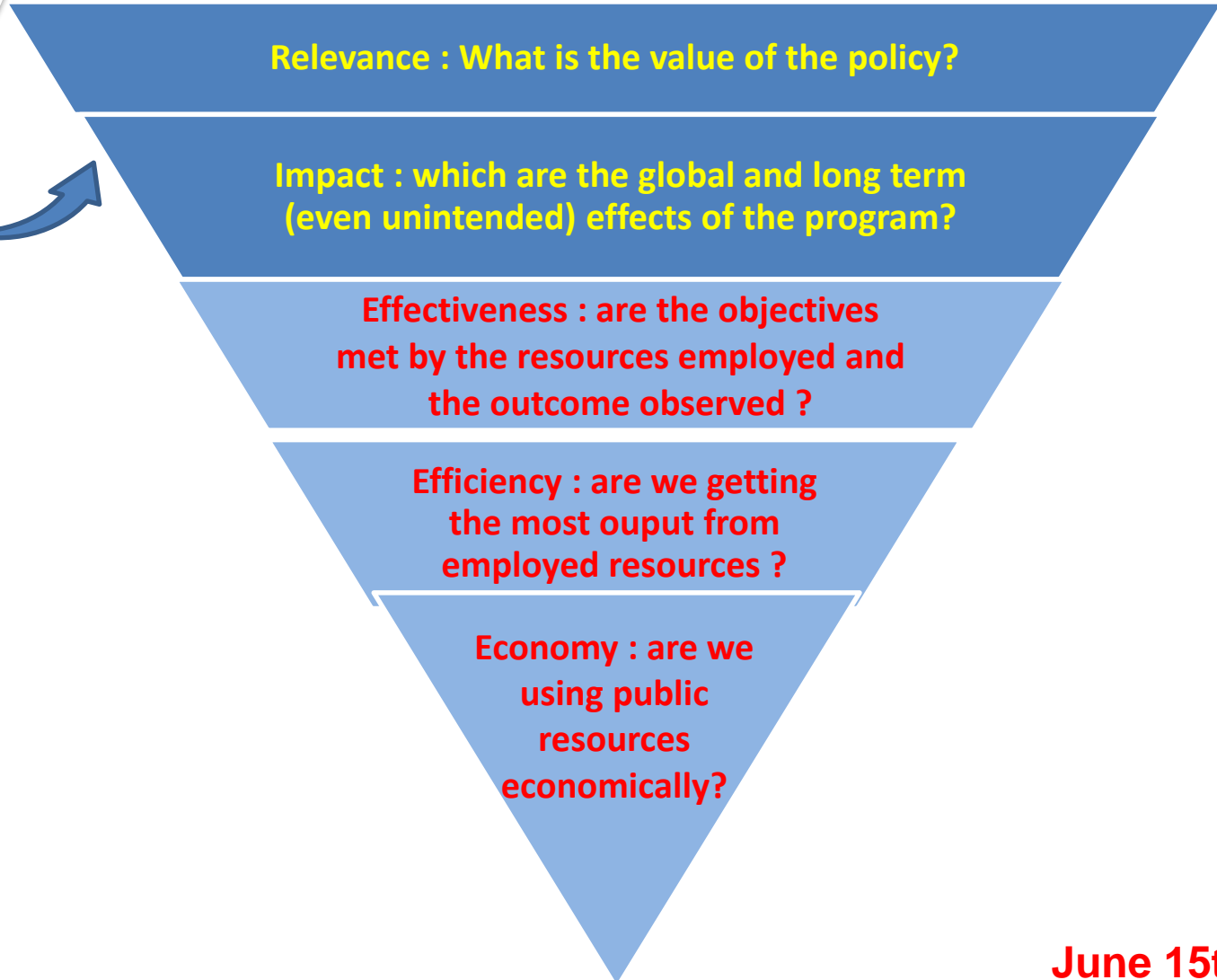
Evaluation as presented on the methodological guidelines (2)



**More Performance audit
than Evaluation**



**More Evaluation than
Performance audit**

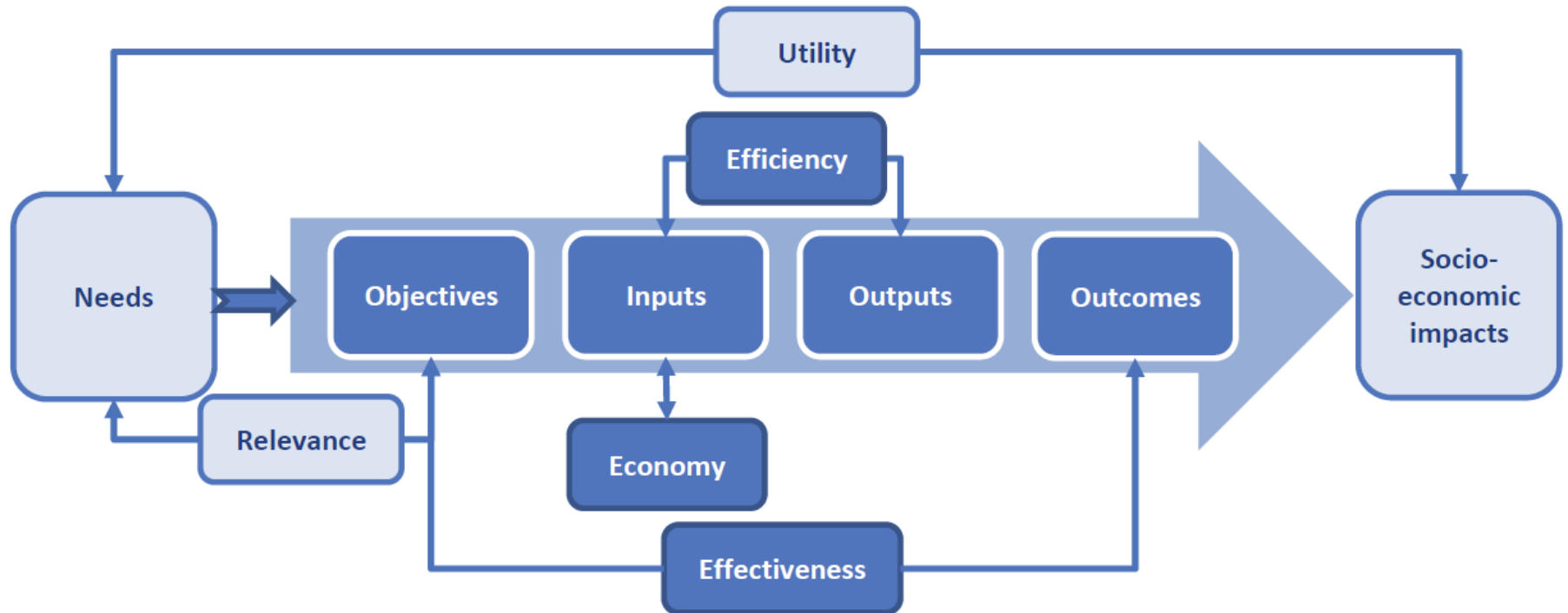




SOME SPECIFIC CHARACTERISTICS OF AUDIT AND EVALUATION



Audit and evaluation



Scheme legend:

- Specific to evaluation of public policies
- Used in performance audit as well as in evaluation of public policies



Difference between audit and evaluation (1)

In both evaluation of public policies and performance audit, there is an examination of the causal relationship between public action and its effects.

But there is a difference between these two approaches:

- As recalled in ISSAI 300, performance auditing deals with the audit of economy, efficiency and effectiveness. Performance audit mainly assesses economy, efficiency and effectiveness up to the immediate outcome level while assessment of same up to higher outcome and global and socio-economic impact levels is defined as evaluation.**



Difference between audit and evaluation (2)

- **Furthermore, evaluation of public policies focuses on relevance and utility of a policy**
 - the relevance of a policy, which is the adequacy of its objectives regarding the social, economic, or environmental needs that the policy wanted to meet;
 - the utility of a policy deals with the question of knowing whether the policy was worthwhile, taking into account all its direct effects (outcomes) and indirect effects (impacts), even unintended or unexpected, on the one hand, and the needs that this policy wanted to meet, on the other hand
 - evaluation of public policies should not limit itself to pre-established goals and reserves the right to call into question the objectives set out in legislation. The main issue of its examination should be to assess the utility of a policy as much as the effectiveness of its instruments.



Complementarity of audit and evaluation

- Both approaches are however complementary and constitute two decisive components in order to ascertain the utility of a policy.
- Measuring the effects of the policy allows making an assessment of the efficiency and the effectiveness of the policy evaluated, elements that are constitutive components of the performance auditing. The latter will then be used to contribute among other elements (considerations of other policies operating in the same field or concerned with the same preoccupations, examination of alternative policies...) to the deeper appreciation of utility.
- This approach is a very distinctive feature of a public policy evaluation. It may happen that a performance audit addresses the issue of the utility of a public policy at the end of its investigation. But such concerns are not common practice and do not belong to the main tasks of a performance audit, as stated in the ISSAI 300 standard.
- In conclusion, the primary characteristic of the evaluation of public policies is the presence of an assessment on the relevance of the objectives and issuing recommendations to improve (or reconsider) this policy.



EVALUATION IS BASED ON SPECIFIC
TOOLS: THE SO CALLED
QUALITATIVE AND QUANTITATIVE
APPROACHES



Causation proof can be relying on theory-based approaches...

Program theory

- An explicit theory of how an intervention contributes to the intended or observed outcomes, which has two components:
 - **Theory of change** : The process by which change comes about (for an individual, organization or community)
 - **Theory of action** : How the intervention is constructed to activate the theory of change



(EU definition)

... and/or on counterfactual impact evaluation

- In its simplest form, counterfactual impact evaluation is a method of comparison which involves comparing the outcomes of interest of those having benefitted from a policy or program (the “treated group”) with those of a group similar in all respects to the treatment group (the “comparison/control group”), the only difference being that the comparison/control group has not been exposed to the policy or program.
- The comparison group provides information on “what would have happened to the members subject to the intervention had they not been exposed to it”, the counterfactual case



HOWEVER, THE HUMAN
PARAMETER IS THE MOST
IMPORTANT FOR A NEED OF A
STRICT SEPARATION BETWEEN
EVALUATION AND AUDIT



AN EVALUATION IS CARRIED OUT WITH THE STAKEHOLDERS OF THE EVALUATED POLICY

- **The evaluation of a public policy is a specific process notably because it relies upon cooperation and sometimes co-construction of the approach with stakeholders who are :**
 - actors in the policy,
 - direct or indirect beneficiaries of the actions evaluated,
 - or simply affected by this policy



AN EVALUATOR CANNOT BE AN AUDITOR

- **As a Project Building Process with the main stakeholders, an evaluation needs to establish mutual trust and co-working between the evaluator and the stakeholders**
- **The evaluator is therefore not a policeman but rather a partner with the institution in the improvement of the program**
 - The evaluator does not look into compliance but checks if regulation is useful for the utility of the policy



CONCLUSIONS - QUESTIONS