

Document: EC 2020/111/W.P.4/Add.2
Agenda: 5
Date: 19 October 2020
Distribution: Public
Original: English

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Comments by the Senior Independent Advisors on the Draft Revised IFAD Evaluation Policy

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Evaluation Committee — 111th Session
Rome, 22 October 2020

For: **Review**

Comments by the Senior Independent Advisors on the Draft Revised IFAD Evaluation Policy

By Ivory Yong-Protzel, Director Office of Evaluation and Oversight, InterAmerican Development Bank (IADB)

A. Task

1. It is understood that a taskforce comprising of the Management units and the Independent Evaluation Office (IOE) was constituted in November 2019, assisted by senior external consultants, to revise the Evaluation Policy of IFAD. A first draft of the revised policy was shared with IFAD Management and IOE and, based on the comments received, a revised draft was later shared with external Advisors with experience with evaluation policies to seek comments. Therefore, this short report provides comments to the IFAD's Revised Evaluation Policy.

B. Background

2. This update of the IFAD Evaluation Policy follows the recommendation by the second independent External Peer Review of the IFAD evaluation function, conducted in 2019 by the Evaluation Cooperation Group.
3. Paragraph 2 of the Revised Evaluation Policy presents the shortcomings of the existing policy as identified by the External Peer Review, while Paragraph 3 presents the purpose of the revision of the policy.

C. Comments

4. Also following the recommendation of an External Review of the Evaluation Function by an Independent Review Panel, the Inter-American Development Bank Group elaborated and approved a new evaluation policy ([link](#)) in 2019. During this process, we did revise the current IFAD policy, reaching (albeit not benefiting from interviews with IFAD) similar conclusions to those of the external review panel.
5. We also identified two clear trends among more recent evaluations policies. One is that more recent policies tend to be shorter, centered on the key features of the evaluation function and are less descriptive and detailed on products, methods, and processes – which are often part of separate guidelines. In this way, the policies are not only more focused but are also more resilient to the test of time. A second trend is that more recent policies tend to be institution-wide rather than focused only on the central evaluation department. This reflects the fact that, progressively, evaluation is no longer considered the exclusive responsibility of evaluators but, with different roles, the responsibility of the whole institution.
6. In this sense, we appreciate the effort made by IFAD to update their evaluation policy and render it more in line with current good practice.
7. My comments can be summarized in three broad areas, described below. In addition, I am sharing a marked-up copy with detail comments, most of which refer to one of these three themes but in different places of the document.
 - i. A more focused policy document:
 - a. The Revised Evaluation Policy is more focused, and it has appropriately dropped much of the details it had with regards to products and the conduct of the evaluation. I understand, these will be reflected in specific guidelines that will be developed or updated – and for which future updates will not need an update of the policy.
 - b. The policy covers IFAD's system of evaluation and not only the independent evaluation department and attempts to define roles and responsibilities for each actor.
 - c. It also distinguishes the purpose of the evaluation system and its audience.

- d. Finally, it defines clearer, better principles than the previous policy, where some of the principles overlapped the objectives of evaluation.
 - e. With regards to these aspects, the Revised Evaluation Policy addresses the key issues identified by the External Peer Review. It is also of much interest that the Revised Evaluation Policy includes a Theory of Change of the evaluation function.
- ii. Unclear roles and responsibilities
- a. Perhaps because it is the first attempt to produce an institution-wide evaluation policy, this Revised Evaluation Policy does not distinguish sufficiently clearly between the roles of self-evaluation and of independent evaluation, making them almost parallel in their functions. This is to the extent that the reader wonders why, in such a case, IFAD would need two different evaluation units. In reality, each one of them has specific comparative advantages and value to offer to the institution. And each one should work on what each is best positioned for, without mixing the functions. They need to be complementary, not competing, to best serve the institution.
 - b. Furthermore, it should be clearer that the independent evaluation ensures the quality and integrity of the evaluation system by bringing and sharing best practice. The respective roles on self-evaluating vs validating those results as well as on implementing evaluation recommendations vs tracking the implementation should be more clearly spelled.
 - c. In addition, several paragraphs mention partnership, collaboration, cooperation or coordination of self- and independent evaluation even in instances where it does not seem justified, that could make the work of each unit less effective and efficient and to an extent that it would impair the independence of IOE. In particular, the way the principle on "Partnership and collaboration" is worded, raises many questions.
 - d. More generally, several passages give the impression that IOE is not independent (as per best practice). And the description of independence does not include an important dimension clearly enunciated in the Evaluation Cooperation Group's good practice standards: the "protection from outside interference", which includes for instance the ability of the evaluation office to set priorities, design processes, and define products, as well as to decide on the design, conduct, and content of evaluations, reach judgments and disclose its evaluations.
 - e. It should be noted that independence is not an end by itself but the means to enable credible, objective evaluation and as such needs to be respected for the whole evaluation system to work properly.
 - f. Finally, in term of the roles, the Revised Evaluation Policy does not describe clearly enough the role of the Board and, in particular, with regards to independent evaluation department. IOE is supposed to report to the Executive Board through the Evaluation Committee. This, for instance, entails that the Board is the main counterpart to discuss the elaboration of the work plan and the budget. The Board is also the main audience and recipient of the independent evaluation products. Generally speaking, the role of the Board is mostly described on its oversight responsibilities with respect to IOE but not as a *user* of IOE work (see also next point).
- iii. Ambiguous emphasis
- a. There is a strong emphasis on learning, results management, and evidence-based decision making that is very positive from the side of management (e.g. *"Evaluation function plays a central role in improving IFAD strategies and operations throughout their lifecycle, by providing necessary evidence in a timely manner to decision-makers. As such, a robust evaluation policy is key to enhancing development and organizational effectiveness of the Fund."*)

para 11). This emphasis (and the limited distinction between self- and independent evaluation) induces to think that evaluation's main role is to provide inputs for the management of the institution, for the day to day running of the institution. At the same time, it minimizes a key purpose of evaluation which is to support the Board (and other stakeholders) to hold management accountable for their activities and performance. Independent evaluation is uniquely positioned to provide inputs to the Board to support them to discharge their responsibility to oversight management. Learning is important but such little emphasis on accountability will deserve the institution.

8. Secondly, depending how "evidence-based" is defined, this emphasis on evidence-base for decision making may also entail minimizing the more analytical aspect of the evaluation work: the assessment.
9. Finally, there is also an emphasis on effectiveness (*16 hits: development effectiveness, organizational effectiveness, cost-effectiveness*), while giving little importance to relevance (*3 hits, one of which refers to the strategic relevance of evaluation*) of policies, strategies, programs, projects. Effectiveness is certainly important and measures the extent to which objectives are being achieved. However, measuring effectiveness without analyzing relevance is asking if something worked well (or not) without asking if it was needed or appropriated in the first place. It may lead to conclude that IFAD is 'successfully' supporting programs but on areas where there was no need. In other word, that it is successfully progressing in the wrong direction, wasting scarce resources and missing opportunities. Relevance must remain a key component of the evaluation approach.

Smaller points

10. Evidence-based evaluation is different from evaluation based (or grounded) on evidence. Evidence-based evaluation refers to evaluation that is NOT objectives-based, i.e. the evaluator looks at what has worked (or not) regardless of the objectives initially set (i.e. regardless of the Theory of Change). I understand that this is not the evaluation approach of IFAD.
11. Communication, disclosure, and dissemination are three different concepts and merit to be mentioned clearly as transparency is a key element that complements both learning and accountability.
12. Finally, I would advise, to the extent possible, to trim out of the final document all introductions, descriptions of context and other explanations in order to have, at the end, a clean and lean self-standing evaluation policy document that can be properly communicated and disseminated to a wide audience. As drafted now, it is not clear where the evaluation policy starts; the same issue existed on the previous evaluation policy.