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# Evidence-based policy as public entrepreneurship

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## ABSTRACT

In the 21st century, evidence-based policy has garnered significant attention in both theory and practice. Scholars have levied various criticisms of evidence-based policy making, suggesting the need for a new analytical framework. I argue that evidence-based policy can be understood as public entrepreneurship: a systemic process in which actors exercise judgment and collaborate regarding policy change. Experts, policy entrepreneurs, and policymakers have functions in this process. Evidence is viewed as a resource that may or may not further entrepreneurial plans, and the institutional environment shapes plan revision. To illustrate, I analyse 'Housing First' homelessness policy in the United States.

**KEYWORDS** evidence-based policy; public entrepreneurship; homelessness; housing first

## Introduction

While a clear definition remains elusive, evidence-based policy (EBP) is broadly understood as the practice of implementing, evaluating, and revising public policy based on empirical research and data. In the 21st century, EBP has gained significant traction, influencing social and health policy prescriptions in the UK, Australia, the US, and elsewhere. Supporters emphasize quantifiable benchmarks, arguing that data-driven results help to advance the public interest. This sentiment is captured in the oft-quoted EBP mantra, 'what matters is what works.' Data-driven research 'works' to prescribe and evaluate policy outcomes, so it 'matters.'

Under the most ideal conditions, EBP might be viewed as a process in which disinterested experts generate technical solutions to problems, and policymakers passively synthesize this research to select the optimal policies. But criticisms of EBP have cast doubt on such a view, highlighting complexity, incomplete knowledge, limited capacity, and unclear incentives (see, for instance, Sanderson 2002; Pawson 2002; Botterill and Hindmoor 2012; Watts 2014; Cairney 2016; Newman, Cherney, and Head 2017). These critiques call for an analytical framework that can account for EBP's myriad departures from this 'technological' ideal. The theory of public entrepreneurship provides such an analytical framework.

My view is that EBP is a process of public entrepreneurship, in which policymakers utilize scientific evidence alongside other resources to engender policy change. Policy change – whether to revise existing policy or implement new policy – is a form of innovation. Scientific advances offer *potential* opportunities for such

innovation. But purposeful, creative action is required to synthesize research findings into public policy. Public entrepreneurship is characterized by uncertainty: neither the full set of means nor of ends is clear. Policymakers must subjectively select and evaluate evidence when introducing or altering public policy, and policy ends are revised over time. Public entrepreneurship is both enabled and constrained by institutions, the ‘rules of the game.’ Subjectivism, uncertainty, and innovation are core elements of entrepreneurship theory, and they are also intrinsic features of EBP. Public entrepreneurship is thus a fruitful framework for understanding EBP: a process of subjectively-driven innovation within a complex system.

The framework presented here brings together research on entrepreneurship and the policy process to enhance the literature on EBP. Public entrepreneurship has been studied by several disciplines, and many have identified ‘policy entrepreneurs’ as agents of policy change (e.g. Kingdon 1984; Roberts and King 1991; Mintrom and Vergari 1996; Cairney 2013). But none to my knowledge has proposed framing EBP itself as public entrepreneurship.<sup>1</sup> The public entrepreneurship lens is a particularly revealing way of analysing the policy process in instances where a policy is understood to be ‘evidence-based.’ I highlight a new set of challenges and features, including an emphasis on uncertainty, subjective judgment, the pursuit of plans, and systemic innovation. This framework should provide new insights for the study and practice of EBP going forward.

The next section surveys EBP in theory and practice. Then, the concept of public entrepreneurship is introduced, and my analytical framework is presented. Next, the challenges of entrepreneurship in the policy process are highlighted. The framework is compared to alternatives in the literature and is then illustrated with an important EBP: homelessness policy in the United States. The conclusion provides implications.

## **Evidence-based policy in theory and practice**

While the notion of evidence informing political initiatives is as old as the fourteenth century, EBP emerged as a distinct object of practical and theoretical debate over the past two decades (Nutley, Walter, and Davies 2007; Wells 2007). The term is often credited to Adrian F. M. Smith, who articulated a vision ‘in which informed quantitative reasoning is the dominant modality in public debate’ (Smith 1996: 367). The UK Labour government championed and popularized EBP the 1990s; many scholars saw a fresh opportunity to improve policy as hired experts. By 1999, three new units were established in the Cabinet Office to facilitate the adoption of EBP: the Innovation Unit, the Social Exclusion Unit and the Centre for Management and Policy Studies (CMPS).

UK Cabinet member David Blunkett’s address to the Economic and Social Research Council in February 2000 captured EBP’s acceptance, calling for a new age of policymaking in which social science provides government with ‘what works and why and what types of policy initiatives are likely to be most effective’ (Blunkett 2000, quoted in Parsons 2002). His words reflected the broader sentiment behind the Labour government’s move towards social policy reform. By 2006, Burton concluded, ‘evidence-based (or evidence-informed) policy making seems to be firmly entrenched as an operating principle for most public policy organisations [*sic*] in the UK’ (2006: 190). EBP has informed UK policy outcomes in healthcare, education, criminal

justice, social care, welfare, housing, transportation, urban renewal, and other areas (Davies, Nutley, and Smith 2000).

A large literature debates the nature and promise of EBP, much of which is rooted in questions about the nature of policymaking. In its most ideal type – what Cairney (2016) calls ‘comprehensive rationality’ – policymaking is a linear process in which policymakers identify societal preferences, appropriate and synthesize evidence, and implement policy.<sup>2</sup> Brownson et al. write that proponents of EBP often view policy-making as a ‘recursive process’ that advances in the desired manner with each iteration (2009: 1579). Indeed, ‘The idea of evidence-based policy and practice fits most naturally with rational models of the policy-making process’ (Davies, Nutley, and Smith 2000: 35), where ‘rational’ implies a step-by-step cycle of implementation, learning, and adaptation.

But modern theories of the policy process point out myriad departures from this ideal. Kingdon’s (1984) ‘streams analysis’ suggests that problems must be defined and framed to align with available solutions and political context for policy change to occur. ‘Agenda setting’ suggests that actors compete to frame issues, assert values, and develop emotionally-based understandings of problems. Punctuated equilibrium theory emphasizes the tendency for long periods of policy stability followed by brief periods of disproportionate attention and policy change (True, Jones, and Baumgartner 1999; Baumgartner et al. 2009; Jones and Baumgartner 2012). Rather than responding to evidence in a linear, predictable manner, policy change happens sporadically and suddenly. The advocacy coalition framework holds that individuals form coalitions to translate shared beliefs into policy (Sabatier 1988; Jenkins-Smith et al. 2014). Here, policy decisions are more shaped by the goals and values of dominant coalitions rather than an objective, systematic application of evidence. Models of innovation and diffusion (e.g. Berry and Berry 1990) suggest that policies can spread to other governments in various ways beyond rational, linear policy adoption. While these theories of the policy process diverge in many respects, all emphasize complexities that contradict the notion of a rational, cyclical policy process most amenable to EBP success.

Many researchers have explicitly criticized EBP using these and related insights from policy theory. Head (2008a) challenges the ‘rational’ basis for EBP on three grounds. First, political decision-making elevates ‘politics, judgement and debate’ over facts (*ibid*: 9). Second, political knowledge, scientific knowledge, and professional implementation knowledge all interact in the policy process; each type represents a unique ‘evidence base’ that must be mediated alongside the others. Finally, the complex arrangement of modern policy networks suggests that policy innovation need not occur predictably. Botterill and Hindmoor (2012) assert that ‘bounded rationality’ (Simon 1957) shapes both the collection of evidence and its implementation. An even more sceptical view holds that policymakers simply use evidence to affirm ideological priors and achieve extant (pre-evidentiary) political aims.

A related strand of critiques argues that EBP obscures the role of values in the policy process, providing only a veneer of objectivity (Head 2008a). Drawing on the work of Lasswell (1951), Parsons (2002) argues that evidence is intrinsically embedded in a context of values and power. Marston and Watts highlight ‘the political model of policy-making, where research interacts with values and vested interests to determine policy outcomes’ (2003: 146); even the types of research that policymakers value (e.g. simple statistics, published quantitative research, qualitative

findings) critically influences policy outcomes. Head (2010b) suggests a very limited role for evidence in practical policymaking:

Policy decisions in the real world are not deduced from empirical-analytical models, but from politics and practical judgement. There is an interplay of facts, norms and preferred courses of action. In the real world of policy-making, what counts as ‘evidence’ is diverse and contestable. The policy-making process in democratic countries uses the rhetoric of rational problem-solving and managerial effectiveness, but the policy process itself is fuzzy, political and conflictual (Head 2010b: 83).

Abundant examples exist when research has been ignored or used selectively. Lamenting the limited role of knowledge in practical EBP, Pawson et al. write, ‘we simply stop when we are satisfied that explanations are firm enough to carry the policy decision’ (2011: 543). Parsons (2002) argues that the UK Labour government’s implementation of EBP increased confusion in the relationship between evidence and policy, serving to enhance management and control of the policy process rather than increasing social science’s ability to shape policy outcomes. Boaz et al. (2008) suggest that the Labour government’s emphasis on ‘what works’ led to the privileging of certain types of evidence over others. The shortcomings of EBP in practice have been highlighted in public health (Hunter 2009), biofuels (Sharman and Holmes 2010), immigration policy (Boswell 2009), juvenile crime (Marston and Watts 2003), and water policy (Head 2010a), to name only a few examples. Critics of EBP differ in their degree of scepticism but share a sense that EBP has fallen short of expectations.

Despite these criticisms, many still look to EBP as the best path towards policy improvement. Proponents of EBP may be categorized in two broad camps: optimists (e.g. Cabinet Office 1999) and pragmatists (e.g. Sanderson 2002; Pawson 2006). While acknowledging limitations, optimists view EBP as the clear path to ‘modernized,’ ‘non-ideological’ governance, a notion most consistent with an ideal type, ‘rational’ policy process. Ron Amann articulates the optimistic view: ‘Donald Schön perhaps went too far in once describing the policy process as “a swampy lowland where solutions are confusing messes incapable of technical solutions”... I believe that there is firmer ground. We should mark it out and occupy it’ (quoted in Davies, Nutley, and Smith 2000: ix). Even when the political sphere at large is treated as ‘irrational,’ optimists hold that EBP will reduce subjectivity and bias. Kay (2011) reports, “many of the champions of [EBP] introduce an implicit separation of politics as irrational from evidence-based policy analysis as rational, with the former as the antithesis of the latter” (2011: 238).

Pragmatists have been more acutely concerned about the critiques of EBP, often offering their own. But the pragmatic approach seeks to improve the understanding and implementation of evidence considering these contextual limitations. Cartwright and Hardie accept EBP as the *modus operandi*, abstracting away from the influences of money, ideologies, values, popular opinion (2012: 12) to offer insights on how to avoid misapplications of research and to gather relevant information. Sanderson (2002) argues better evaluation of pilot programmes to improve EBP. To Sanderson, acknowledging the complexity of the policy process does not undermine the EBP agenda but instead necessitates “social learning:” ‘With a realist commitment in policy and programme evaluation to expanding the evidence base on “what works,” coupled with governance processes that embody a serious commitment to

learning from such evaluation, we can potentially achieve a rational basis for the guidance of social change towards collectively desired ends' (2002: 10).

Pawson (2006) presents a 'realist synthesis' path for EBP rooted in systematic reviews of existing research. He emphasizes the contested and 'quarrelsome process' of science – hence, of policy influenced by science. Rather than objective and certain, evidence is 'partial, provisional and conditional' (*ibid.*: 176). If the scientific process can be better understood, a practical delineation for evidence can emerge to limit EBP overreach. Pawson asserts that policy interventions are 'complex systems thrust amidst complex systems' (*ibid.*: 168). While EBP 'should be seen as a process and an objective,' evidence should not be expected to provide '*the solution to the problem*' (*ibid.*: 180). Instead, careful review of available evidence can at least provide an input of partial knowledge to potentially improve decision-making (*ibid.*: 180).

### Public entrepreneurship: theoretical foundations

My framework for viewing EBP as public entrepreneurship draws elements from three vibrant conceptions of entrepreneurship: innovation or change (Schumpeter 1934), judgmental decision-making (Knight 1921), and alertness to opportunities (Kirzner 1973). These three approaches to entrepreneurship emphasize *function* rather than *occupation* (e.g. starting a business), facilitating their applicability to the public sector (Klein et al. 2010).

Public entrepreneurship is most often associated with the Schumpeterian notion of innovation, which stresses the introduction of new policies and processes (e.g. Roberts and King 1991: 149–50). This conception is fruitful for understanding EBP but is likely incomplete. Innovation entails the introduction of novelty, but EBP also involves mundane policy revision and policy inaction. Indeed, choosing *not* to change policy based on new evidence is one of the common critiques of EBP. While 'innovation' encompasses many activities, focusing on change alone rules out cases where evidence is ignored or utilized to preserve the status quo.

The 'judgmental decision-making' view of entrepreneurship helps close this gap.<sup>3</sup> The distinction between risk, which can be assigned a probability, and uncertainty, which cannot, is central to this framework (Knight 1921). Entrepreneurs face uncertainty rather than risk. Action in the face of uncertainty requires judgment: the subjective evaluation of the relationship between available means and potential ends. Judgment involves expectations about future conditions; it is the element of decision-making that requires imagination, creativity, and instinct (Foss and Klein 2012). Exercising judgment entails decisions over the deployment of scarce, heterogeneous resources in an uncertain, competitive environment. If evidence is ill-suited to the relevant ends, it need not influence policy. Conversely, policy change occurs when a variety of means (e.g. evidence, funds, political interest) are ushered in tandem towards policy ends.

The 'alertness to opportunities' construct, pioneered by Israel Kirzner (1973), also informs my framework. This approach traditionally views entrepreneurship as alertness to profit opportunities resulting from disequilibrium in the market process; alert entrepreneurs arbitrage price discrepancies to capture monetary profits. Entrepreneurship functions to equilibrate the market process. But the broader 'Austrian' tradition (upon which Kirzner builds) casts entrepreneurship as an omnipresent feature of human action (Mises 1949; Boettke and Coyne 2003; Koppl and

Minniti 2003).<sup>4</sup> Entrepreneurs are alert to opportunities to achieve their ends *across institutional contexts*, a broader conception that directly links entrepreneurship to institutions (Boettke and Coyne 2009). Institutions – the ‘rules of the game’ (North 1990) – shape entrepreneurs’ opportunities and feedback mechanisms and influence the tendency for entrepreneurship to create social value (Baumol 1996, Lucas and Fuller 2017) and for entrepreneurial plans to be corrected (Wagner 2010).

## Evidence-based policy as public entrepreneurship

Drawing on these three foundations, public entrepreneurship may be defined as *a process of judgmental decision-making under uncertainty where evidence and other resources are utilized in relation to policy change in the pursuit of political ends*. This definition yields an analytical framework to address the critical elements of EBP. Because entrepreneurship is a process, many individuals are involved. Judgmental decision-making highlights the availability of many potential sources of evidence and positions evidence alongside other potential resources. Finally, political ends entail competing goals that are pursued over time within a specific institutional context that shapes opportunities and feedback mechanisms.

Within the process of public entrepreneurship, there are at least three categories of relevant actors: policy entrepreneurs, policymakers (or decision makers), and experts. These three categories, described below, have *functions* that are mutually exclusive. However, since they relate to functions, individuals may fall into multiple categories.

The concept of entrepreneurship is not foreign to theories of the policy process. Policy entrepreneurs are commonly introduced as sources of policy change (Kingdon 1984; Roberts and King 1991; Mintrom and Vergari 1996; Mintrom and Norman 2009; Heikkila et al. 2014). Policy entrepreneurs collect and supply policy solutions in advance, advocating an issue for long periods of time until ‘windows of opportunity’ arise to engender policy change (Cairney 2013; Cairney 2016). Such actors can be inside or outside government, and they typically are identified as individuals who champion a cause over the long haul.<sup>5</sup> But as Roberts and King (1991) indicate, the policy entrepreneur is one type of actor within the broader concept of public entrepreneurship. In modern policy making, public entrepreneurship is typically a collective phenomenon, involving many individuals in direct or indirect collaboration (Klein et al. 2010: 11).

Bernier and Hafsi (2007) distinguish between *individual* and *systemic* public entrepreneurship. In homogeneous and stable environments, public entrepreneurs are typically forceful, visionary individuals who take personal risks and utilize public resources to engender change. However, heterogeneous and turbulent environments lend themselves to systemic entrepreneurship: team-based processes of innovation involving multiple actors and possibly multiple organizations.<sup>6</sup> Well-established, complex organizations tend to engage in systemic public entrepreneurship. This is the domain of EBP: many stakeholders and agencies typically play a role in the creation and implementation of evidence-based policies amidst established bureaus in complex environments. Thus, I treat EBP as a ‘systemic’ phenomenon. Individual policy entrepreneurs have a place in this framework, e.g. advocating and framing policy issues, gathering evidence, and proposing solutions. But *public entrepreneurship* requires collective decision-making within and across policy making organizations to implement EBP.



Policymakers are people who collaborate to make policy, both elected and unelected (Cairney 2016). While elected actors provide broad mandates through legislation, unelected policymakers (e.g. in bureaucratic organizations) often create and implement EBP within those mandates. These policymakers synthesize available evidence, exercise judgment, and deploy physical and institutional resources to achieve EBP ends. Uncertainty pervades this process, so EBP involves significant gaps in relation to both ends and means. Existing research cannot provide probabilistic risk for every possible policy outcome, so subjectivity, judgment, and knowledge are critical issues. Public entrepreneurs must exercise judgment in deploying resources; this suggests that the synthesis and application of evidence is susceptible to error.

Pawson, Wong, and Owen (2011) assert that every EBP is fraught with incomplete knowledge, conditional conjectures, and conflicting evidence. They highlight the importance of ‘unknown unknowns,’ or ‘things that we do not even know that we do not know’ (2011: 543). Such ‘unknown unknowns’ are a form of uncertainty: the full set of outcomes is unknown, and risks are not probabilistic. While informed by the available information, entrepreneurial decision-making requires judgment regarding a set of future conditions that cannot be modelled *ex ante*: the policy-making problem space is open-ended.

Decision makers’ cognitive ability to consider evidence also influences judgment. Cairney (2016) argues that bounded rationality limits policymakers’ ability to consider all potentially relevant evidence. Such psychological factors would be compounded by Knightian uncertainty: policymakers can neither process all the evidence *nor* predict all possible outcomes. If bounded rationality pervades public entrepreneurship (e.g. the ease of recalling a problem increases its perceived importance), the result is likely to be ‘biased judgment.’

Experts are those who produce evidence (i.e. academic research, independent agency meta-analyses, collection of statistics). Experts may also be policy entrepreneurs; however, they do not create policy in their role as experts. Rather, policymakers rely on experts as sources of evidence (and potentially advice for EBP). Since evidence is creatively invented, measured, and interpreted, policymakers must have knowledge and aptitude for measuring and interpreting available research. In terms of public entrepreneurship, this suggests that EBP is contingent on the existence of *dynamic capabilities* – stable patterns of activity in policymaking organizations – that facilitate the use of evidence (Piening 2013). Where these capabilities are weak or non-existent, evidence is unlikely to influence policy outcomes. Newman, Cherney, and Head (2017) draw attention to the need for policy capacity in EBP: the knowledge and experience necessary to accurately synthesize and apply evidence. Surveying over 2,000 Australian bureaucrats, they suggest that both ‘organizational and individual deficits’ may undermine the viability of EBP (Newman, Cherney, and Head 2017: 158). In addition to evidence-related dynamic capabilities, EBP is constrained by the capabilities of those private and public organizations that implement policy. Evidence may suggest a set of ‘best practices’ for workplace safety that require capabilities that affected organizations lack. Such a gap is often unclear *ex ante*. Dynamic capabilities can thus constrain and shape policy goals over time (Klein et al. 2013).

To innovate over public policy, public entrepreneurship requires heterogeneous resources and knowledge. In the context of EBP, evidence, funding, and political



interests are resources that entrepreneurs coordinate to create policy. This highlights the importance of *complementarity* of evidence and other factors. Whether evidence is utilized is contingent on its fit within the given context: e.g. public perception of the policy issue, dynamic capabilities, funding availability, support from relevant coalitions, etc. Research is most likely to validate or influence policy outcomes when it has complementarity with these other factors. Conversely, research lacking complementarity with available resources and context is likely ignored.

Public entrepreneurs are constrained in various ways. Potential policies available to public entrepreneurs depend on the connection between (1) existing research and evidence and (2) the control rights and general mandate of the policymaking entity. This connection is *created* and may be strong or weak in any EBP. The entrepreneurial outlook recognizes this subjectivity and thus invites scrutiny over the emergence of policy means.

Public entrepreneurs are often assigned missions determined through the policy process. Public entrepreneurship entails translating general mandates into practical ends. When political mandates are vague and open-ended, public entrepreneurship involves formulating the abstract into concrete ends. Actors must exercise judgment in the selection of definitions, measurements, and benchmarks against which a policy will be measured. Thus, the measurement and evaluation of EBP success results from creative, subjective judgment rather than objective synthesis.

### Evidence-based policy and the policy process

Entrepreneurial problems are dynamic; entrepreneurs act in time (Mises 1949). Because entrepreneurial efforts exist under uncertainty, they are prone to error. Entrepreneurial problems thus require adaptability, which is a function of the institutions within which entrepreneurship occurs. Stated differently, institutions both limit and enable innovation. Entrepreneurs act in an uncertain, dynamic environment and revise their plans based on feedback. The available feedback mechanisms depend on the nature of the process: does the policy process generate feedback that creates a tendency to generate increasingly better policies and eliminate inferior ones? Enhancing the information set of policymakers via increased data collection and better evidence can only improve goal achievement if the policy process itself facilitates such a tendency. In an ideal type, 'rational' policy process, policy is based on the best available information and improves over time. As more data become available, policies can be adjusted to a new 'optimum.' Hammersley (2001) characterizes this conception of the policy process as 'linear:' each policy iteration – implementation, evaluation, and adaptation – is a step towards goal achievement.<sup>7</sup>

However, policymakers lack the requisite knowledge to solve problems linearly. As Hammersley (2001) argues, 'in many circumstances the only option is trial and error.' Systematic reviews and evaluation may provide evidence of 'what *worked*' in a certain population at a certain point in time, but do not offer an objective policy solution going forward. Research typically assesses the outcomes of policies that differ in scale, implementation, time, and place from the policies that follow. Thus, evidence on past policy outcomes cannot inform future policy without entrepreneurial judgment, which is used to evaluate the validity and applicability of existing evidence to the present policy context.

Policy outcomes are also influenced by how problems are framed. The notion of a successful policy typically implies a benchmark measure that is deemed normatively important (e.g. the number of homeless people), which is shaped by the societal perceptions of the nature and importance of a 'social ill' – a problem warranting policy intervention (e.g. people not having a home). Given that public entrepreneurship involves many actors, the coordination of policy outcomes is further limited by collective action problems. Many actors with heterogeneous talents and knowledge gather and interpret data, synthesize research, and implement policy. EBP arises from a network of agents who are constantly planning, acting upon their judgments about the future, and revising plans as the future unfolds.

This emphasis on institutions also highlights an inherent complication of public entrepreneurship: the ambiguous relationship between the goals and feedback mechanisms. The objective function of private entrepreneurs is typically profit maximization. In the Austrian conception of entrepreneurship, the lure of profit promotes creative experimentation in the market process, leading to innovation and value creation (Kirzner 1979; Boettke and Coyne 2009). However, market entrepreneurship does not create value *ex ante*. Entrepreneurial production is an uncertain endeavour; whether value has been created (profits) or destroyed (losses) is determined *ex post*. Since judgment is forward-looking in an uncertain environment, some firms inevitably 'get it wrong,' destroying value by using resources inefficiently. However, market institutions discriminate between value creation and destruction, providing direct feedback in relation to the entrepreneur's objective function: profits and losses (Mises 1920). Losses cause entrepreneurs whose beliefs about the future are incongruent with subsequent market values to either exit or revise their plans. Profits indicate value creation on the part of the entrepreneur, revealing that her plan complemented the plans of others.

The objective function of public entrepreneurs is much more difficult to define (Klein et al. 2010), so feedback for plan revision is less clear. Competition still exists in the policy process, but the selection of one plan or outcome over another is not tied to profit and loss. Furthermore, feedback is not clearly tied to the creation of social value, because the *opportunity cost* (the best forgone alternative) of a given policy goal is not identified. EBP seeks to overcome the absence of price observables by offering a different observable metric: quantifiable data. However, this is not equivalent to the role of prices, which are observable *and comparable*. Collected data can provide benchmarks in isolation, but they provide no means of adjudicating between outside alternatives (e.g. competing policies and metrics).<sup>8</sup> Furthermore, the type of data collected influences the policy enacted. Public entrepreneurs must necessarily exercise judgment in selecting (and sometimes creating) the data used to evaluate EBP – perhaps creating incentives to select benchmark data and research that will further their plans and to repress those that do not.

In my framework, EBP is a process of trial and error. But through the lens of public entrepreneurship, the tendency for trial and error to improve policy outcomes is ambiguous (e.g. when the available feedback mechanisms are unclear and objective functions are variable). The policy environment is both uncertain and competitive. Despite policymakers' desire to treat policy outcomes probabilistically (Cartwright and Hardie 2012), the full set of possible outcomes cannot be identified *ex ante*. Meanwhile, coalitions compete to elevate their preferred policy issues, attempting to frame problems as both urgent and amenable to EBP. Public entrepreneurship

requires selection from among policy alternatives. Whether policies ‘succeed’ or ‘fail’ is an outcome of competition within the policy process. Public entrepreneurs must select the margins on which they determine ‘success,’ and these margins are not readily comparable across policies. The feedback mechanisms of ‘evidence’ (e.g. research, evaluation) are weak, hence limiting the ability of evidence to ‘guide’ policy outside of entrepreneurial interpretation influenced by the rules of the game in the policy process.

### Alternative approaches to evidence-based policy

Scholars have offered alternative framings for EBP to respond to the many critiques and observed shortcomings of EBP. Sanderson (2009) offers ‘intelligent policy making’ in answer to research on the limited and at times problematic use of evidence in policy making. He argues against a muted call for ‘evidence-informed policy making,’ because ‘it runs the risk of legitimising [*sic*] the status quo and potentially undermining the force of our vision and ideals and our passion and drive to increase the influence of knowledge in the guidance of human affairs’ (2009: 705). Sanderson attempts to revive the normative vision of evidence improving policy by advocating interactive, decentralized trial and error: ‘At the heart of intelligent policy making should be the commitment to experimentation and learning’ (Sanderson 2009: 713). To be realized, this ‘pragmatism’ requires a ‘culture change in policy making’ (Sanderson 2009: 714, Jowell 2003: 34).

My framework shares the ‘intelligent policy making’ framework’s emphasis on the social system’s open-ended, complex nature. But my starting point is the EBP status quo rather than a normative ideal to which policymakers might aspire. Starting with the status quo does not ‘legitimize [*sic*]’ the status quo, as Sanderson (2009) seems to suggest. Instead, doing so informs the extant relationship between political decision-making and evidence. As the patterns observed in the policy process become coherent, these patterns can be judged against various normative positions.

My ‘status quo’ starting point is also more pragmatic than ‘intelligent policy making.’ The reasons for the disconnect between Sanderson’s (2009) desired framework and the status quo are ambiguous; complexity in the system is the only clear culprit. But then the path towards this normative vision requires on ‘culture change’ and a commitment to ‘learning’ among policymakers as prerequisites. Sanderson (2009) acknowledges that the ideal type of a linear, rational policy process is unlikely, but he posits a different ideal type: policymakers who come to share a unified commitment to ‘truth’ and ‘the good of society’ above all else. I emphasize both the complexity of the system *and* the heterogeneity of human goals and values. Public entrepreneurs have subjective and often competing ends that may or may not be benevolent. Even if all relevant actors were to adopt a shared ethos to serve the public interest above all else, they would undoubtedly have conflicting visions of what the ‘public interest’ is. On the other hand, if these actors respond to incentives created by the rules governing their operation (e.g. political expediency, catering to special interests, improving public image, etc.), the ‘experimentation’ that occurs is as likely to benefit certain interests as it is to harm others.

Cairney (2016) offers ‘the politics of evidence-based policymaking’ as another alternative framework, asserting that two key features within the policy process shape the link between evidence and policy. First, psychological biases and emotional

influences stemming from bounded rationality mitigate policymakers' ability to synthesize information. These cognitive limitations force policymakers to rely on heuristics and other 'sufficient' methods for gathering evidence. Second, the complex context of policymaking mitigates the coherence of a comprehensively rational policy process. Instead, policymakers are embedded in networks over which they can exercise little control; policy is more of a collective outcome than an individually driven design. The 'rules of the game' of these networks (and of the overarching system) shape policymakers' incentives – hence, affecting the evidence that they apply. Combining these psychological and environmental (i.e. network-based, institutional) features, Cairney (2016) sees EBP as the product of bounded rationality within a complex system.

The theory of public entrepreneurship complements Cairney's 'politics of evidence-based policymaking' in several respects. Indeed, entrepreneurship theory directly addresses the core elements of the policy process that Cairney (2016) highlights. I conceive of public entrepreneurship as a process within a complex system characterized by uncertainty and institutional constraints (rules of the game). Cairney's (2016) framework highlights many of the intrinsic features of the policy process identified herein and posits decision rules that comport with real-world constraints. In my view, public entrepreneurship provides theoretical depth that is consistent with Cairney's framework, as it constitutes a *mechanism* for policy change within the policy process. Public entrepreneurship emphasizes that the decisions inherent to EBP are made in pursuit of plans, providing a basis for both continuity and change in the dynamic policy process that Cairney (2016) and I both emphasize.

### **Federal homelessness policy as public entrepreneurship**

Homelessness has been described as a 'wicked problem' (Brownson, Chriqui, and Stamatakis 2009), suggesting a confluence of high levels of complexity, uncertainty, and divergence of values and goals (Head 2008b). Homelessness has also been the focus of one of the most notable examples of EBP in the US: the adoption of the 'Housing First' service model in the 21st century. This presents ideal ground for a brief application of the present framework.

In the 1980s, homelessness emerged as an issue of public policy concern in the United States. While the extent of homelessness was unclear – estimates ranged from 250,000 (United States Department of Housing and Urban Development 1984) to several million (Hombs and Snyder 1986) – public concern about homelessness increased significantly (Toro and McDonell 1992). Experts suggested that the demographics of homelessness were shifting from an older, white male-dominated population to a more diverse group including youth, minorities, and families (Tobin and Murphy 2016). In 1987, the federal government passed the Stewart B. McKinney Homeless Assistance Act, providing funding for a variety of programmes aimed at addressing the problem. The Act remains the principal homelessness legislation in the US, and it provides funding for homeless services through community-based networks of service providers, 'Continuum of Care' housing programmes.

In the resulting homelessness infrastructure, the standard way of addressing homelessness was a 'linear' service model: the homeless could advance from emergency shelter to transitional housing to permanent supportive housing or independent housing upon demonstrating 'housing readiness' (e.g. addiction recovery,

mental stability) (Burt 2016). Over time, it became apparent that many homeless persons never managed to demonstrate housing readiness; in particular, single individuals with several mental illnesses tended to experience recurring bouts of homelessness, hospitalization, prison, and homelessness again. Researchers began focusing on this ‘hard to reach’ group (Toro 2007), identifying them as a major source of social costs (Kuhn and Culhane 1998). The US Department of Housing and Urban Development defined the long-term homeless who suffered with mental illness as ‘chronically homeless’ (United States Department of Housing and Urban Development 2008).<sup>9</sup>

In response to this research and public concern for the costs of homelessness, President George W. Bush named ‘ending chronic homelessness’ as a top budget priority in 2003 (Stanhope and Dunn 2011). The Bush Administration established the United States Interagency Council on Homelessness (USICH), a new agency with a mandate to revamp federal homelessness policy. USICH was tasked with realizing this policy end, and under the leadership of Director Phil Mangano, the agency turned to EBP, adopting ‘Housing First’ as the preferred solution to chronic homelessness. Housing First is a service model where the homeless are moved into ‘permanent supportive housing’ – long-term full or mostly subsidized units – quickly and independently of any notion of ‘housing readiness.’ This differs significantly from the linear approach, in which individuals progress from shelter to transitional housing to subsidized or independent housing after addressing mental and behavioural issues.

USICH began deploying funding and instruction to communities through several agencies to implement Housing First in the early 2000s (Stanhope and Dunn 2011). Following the 2008 housing crisis, homelessness policymakers received considerably more resources through the HEARTH Act, which expanded the definition of homelessness and provided increased funding for a new federally coordinated homeless policy response. The federal homelessness budget – focused on Housing First and the related but broader permanent supportive housing – more than doubled from 2009 to 2014 to over \$5.4 billion (Lucas 2016). The USICH strategic plan places EBP at the core of this response: ‘to end homelessness, we must invest in what works: *evidence-based solutions like Housing First*’ (United States Interagency Council on Homelessness 2015: 65, emphasis added).

In my framework, evidence is one resource among many, and it is more likely to be utilized when complementarities exist between bodies of evidence, available funding, and public perception of the problem. Many actors provide resources and an impetus for evidence-based policy making. Experts have a role in supplying evidence. Policy entrepreneurs have a role in framing both evidence and problems to achieve complementarity. Policymakers respond with judgment to implement EBP. While evidence based policies are systemic phenomena, individuals can facilitate this systemic outcome in the roles described.

Many individuals from within and outside government fit these roles in the case of Housing First. Sam Tsemberis is an example of both an expert and a policy entrepreneur in this case. Tsemberis pioneered the Housing First model through his New York City-based nonprofit, Pathways to Housing, in 1992. A researcher, practitioner, and advocate, he also spearheaded a body of research evaluating the Housing First model (Tsemberis and Eisenberg 2000; Gulcur et al. 2003; Tsemberis, Gulcur, and Nakae 2004; Greenwood et al. 2005; Padgett et al. 2011; Henwood, Stanhope, and

Padgett 2011). Dennis Culhane, a prominent researcher, also filled both expert and policy entrepreneur roles, championing the need for evidence-based homelessness policy in the political arena (Stanhope and Dunn 2011). The National Alliance to End Homelessness, headed by Nan Roman, proved another influential voice in the political sphere, highlighting evidence backing the Housing First model to both homeless services practitioners and policymakers (Greenwood, Stefancic, and Tsemberis 2013). From within government, Housing First was championed by USICH executive director Phil Mangano. During the George W. Bush Administration, Mangano pushed to expand Housing First using public resources, urging local partnerships between nonprofit and public homeless services under this new EBP (Stanhope and Dunn 2011). Mangano proved important both as policy entrepreneur and policymaker for Housing First.

This evidence base aligned with renewed public interest in homelessness at the time. One important example of complementarity between evidence and other factors relates to increased discourse on the immense costs of homelessness. Malcolm Gladwell's influential *New Yorker* piece, 'Million Dollar Murray,' describes a homeless man whose journeys in and out of hospitals and prison cost taxpayers \$100,000 annually (Gladwell 2006). Research on Housing First suggested that the service method led reduced costs relative to hospitalization, imprisonment, and other public services (Gulcur et al. 2003; Culhane et al. 2007; Culhane 2008). Because of its complementarity with public interest and political incentives (e.g. to appear to support responsible spending), this 'cost-benefit' research proved a fundamental subset of the evidence employed (Stanhope and Dunn 2011). From within government, Mangano translated this into a call for EBP centred around Housing First, saying, 'Cost-benefit analysis may be the new compassion for our communities' (Eckholm 2006).

Many researchers have expressed an 'optimistic' perspective for this EBP. Tsemberis and Henwood (2016: 70) summarize these conclusions: 'Research has overwhelmingly demonstrated that Housing First is effective at achieving residential stability for people who have remained homeless for years.' Such a framing suggests that evidence provides a certainty of means; only political will is required to implement them. Culhane (1992: 439) writes, 'The lack of political will ... remains a major obstacle in ameliorating the homeless problem.' Burt (2002: 1278) suggests that to end chronic homelessness, 'political will is everything, but political will is usually very hard to sustain as years go by and administrations change.' Crowley (2016: 159) writes, 'Homelessness is not an inevitable or permanent condition of life in this country. It is a problem to be solved. If we choose to, we can end it.' This optimistic view focuses the attention of policy failure on inadequate financial and ethical investment and has persisted in the literature.

However, the present framework highlights the uncertainty that public entrepreneurship entails. Research on Housing First has considered only local implementations; little evidence of the external validity of Housing First at a national scale exists. Additionally, while Housing First has been compared to existing government programmes, no comparative analysis between Housing First and other institutional arrangements for addressing homelessness exists. Rather than through comparison with many alternatives, Housing First research suggested advantages relative to the status quo, and it promised cost savings and did not undermine existing stakeholder interests. To introduce this EBP, policymakers utilized judgment about the ability of



Housing First to remain effective on a much larger scale in new local environments and homeless populations.

In public entrepreneurship, policy goals are treated as plans that are pursued and revised over time. This is evident in the government's homelessness strategy. In 2009, Congress passed legislation that provided increased funding and a renewed mandate for USICH. The Council was tasked with assembling a strategic plan to address homelessness. While these instructions specified broad goals (e.g. ending homelessness), their implementation required interpretation. In response, USICH produced a report detailing 4 goals, 10 objectives, and 66 strategies (United States Interagency Council on Homelessness 2015). These goals can be thought of as EBP ends informed by the political process but enacted by public entrepreneurs in the bureaucracy. EBP ends, furthermore, are fluid; they evolve as time reveals changing conditions. The changing definition of 'chronic homelessness' exemplifies this. After falling short of the stated goal of 'ending chronic homelessness by 2015,' policymakers offered a revised definition of chronic homelessness in 2016, changing the benchmark of success by reducing the scope of the definition.

The definitional change coincides with growing indications that this EBP has had mixed success at its original ends (e.g. ending chronic homelessness and setting a path to end all homelessness). Chronic homelessness reportedly fell 21% from 2010 to 2015 to around 85,000 people. But enumeration methodology improvements over the period are believed to have played at least some role in the reduction. Furthermore, new evidence suggests that the EBP's role in this reduction is unclear. Byrne et al. (2014) find only a modest link between permanent supportive housing and chronic homelessness. Corinth (2017) finds a similarly small effect of permanent supportive housing on homeless populations. Lucas (2017) finds no relationship between federal funding and unsheltered homeless individuals (most of whom are 'chronic').

Viewing EBP as public entrepreneurship can illuminate these relatively unsuccessful results. The promising evidence from several Housing First pilot programmes has not appeared to hold when scaled nationally. Rather than technically synthesizing objective information, policymakers had to exercise judgment that previous findings would hold at a much broader scale – leaving room for uncertainty and complexity to mitigate EBP success. For example, these factors have yielded differences in implementation; scholars have suggested that many Housing First programmes have departed from the original service model. EBP takes place in a complex, open-ended environment, and the implementation of evidence depends on its complementarity with existing policies and practices. The uncertainty and complexity of the problem are beginning to appear evident to policymakers as well. In 2015, the updated USICH strategic plan reported, 'There is growing recognition that the population experiencing chronic homelessness is more dynamic than previously assumed, and that the PIT [Point-in-Time homeless enumeration] methodology does not fully reflect the total number of people experiencing chronic homelessness during the year' (United States Interagency Council on Homelessness 2015: 24). A complementary explanation is that the current chronic homeless population is not sufficiently understood from a psychological standpoint; this is consistent with the incomplete relationship between evidence and policy.

The changing definition of what it means to 'ending homelessness' of any type is another example of fluid EBP ends. While it has been the central goal of modern homelessness EBP since 2010, no explicit definition of 'an end to homelessness' was



initially offered. Ending homelessness was eventually defined as a *system* of homeless service providers in place to respond to homelessness in localities across the country – an example of plan revision by public entrepreneurs.

The framework espoused herein views EBP as systemic public entrepreneurship involving many individuals and organizations. USICH's strategic plan involves programmes that extend across 19 federal agencies, including the Department of Housing and Urban Development, the Department of Labor, the Department of Education, the Department of Defense, the Department of Agriculture, and the Department of the Treasury, among others. Not only must public entrepreneurs coordinate means and ends to allocate physical and policy resources across a host of federal bureaus, but they also must coordinate the myriad relevant interests in local government, private organizations, and nonprofits. The stakeholders explicitly mentioned in the government's strategic plan are myriad (United States Interagency Council on Homelessness 2015):

- Businesses
- State and Local Government
- Law Enforcement
- Workforce Investment Boards
- Community Colleges and Schools
- Nonprofits including Philanthropy
- Crisis Response
- Housing and Service Agencies
- Communities of Faith

Policymakers have attempted to create a 'comprehensive Federal plan to prevent and end homelessness' (United States Interagency Council on Homelessness 2015: 8), which necessarily affects many public and private organizations. These organizations have unique plans that may or may not overlap with the EBP vision.

Policymakers define the data to be collected to measure success of any given EBP. The principle data that emerged regarding homelessness are annual 'Point-in-Time' (PIT) counts: local enumerations in which social workers, volunteers, and police scour the community with clipboards on a January night each year. Scholars have documented political competition over the homelessness data-collection process, noting how the homeless enumerations that inform federal funding decisions have been unreliable and subject to rent-seeking concerns. Williams (2011) recounts how an enumeration in rural California misrepresented the local homeless population due to both the difficulty of locating the homeless and political incentives. Lucas (2016) highlights the methodological squalor surrounding early homelessness counts in several major cities and the associated contestation over the quality and quantity of homelessness data. Corinth (2016) argues that Utah's 'ending chronic homelessness' was more the result of changing definitions than improved outcomes; Cunningham and Henry (2008) describe homelessness data collection as 'a high-stakes numbers game.' These findings are consistent with the premise that the implementation and revision of EBP plans are subjective. Policymakers face an ongoing decision process to maintain the status quo or adjust in response to new data.

The evidence-based movement in homelessness policy is instructive for the broader EBP initiative. From the standpoint of furthering an evidence-based

approach to engender policy change, Housing First has been highly successful – arguably one of the most successful EBP instances in the US to date. The case affirms the importance of public entrepreneurship and the need for a variety of contextual resources (e.g. cost–benefit savings, political incentives, policy entrepreneurs) to be present if evidence is to be utilized. The case also demonstrates the dynamic nature of EBP: the definitions, data, and application of evidence to homelessness have evolved over time. However, in terms of achieving the policy’s intended goals of fighting homeless, the results are limited at best. This is indicative of the uncertainty and complexity of the policy environment, and it reveals that evidence is likely insufficient to improve policy. Homelessness policy continues to evolve, and the evidence base continues to grow and improve; yet, for the time being, the end of homelessness appears to remain elusive.

## Conclusion

EBP has faced various criticisms that have yet to be connected by an analytical framework incorporating its key features. I propose analysing EBP through the lens of public entrepreneurship, as a process of policy innovation that relies on the subjective synthesis and application (or non-application) of scientific evidence over time. This process is dynamic – both research and policy are continually revised as new opportunities manifest – and systemic, requiring coordination among many individuals. Policy decisions are fraught with uncertainty and take place through time: knowledge on the means–ends coherence of any EBP is unavailable *ex ante*. An emphasis on ‘evidence’ sounds uncontroversial: who could be against the use of evidence in decision-making? But framing EBP as public entrepreneurship incorporates the subjective utilization of evidence alongside the open-endedness of a policy process marked by innovation and change.

There are several implications to this argument. First, the uncertainty inherent to public entrepreneurship suggests limits on the ability of evidence to predictably guide policy towards superior outcomes. While policy improvement from evidence is entirely possible in this framework, it is not inevitable. This framing positions evidence as one of many types of resources that public entrepreneurs deploy in their pursuit of plans, without restricting the content of those plans. Thus, the goals of relevant actors are key determinants of the use (or neglect) of evidence. The case provided suggests that EBP is insufficient to address particularly ‘wicked problems’ like homelessness – problems that are complex and persistent. Perhaps EBP provides a better path to address these problems than existing alternatives, but my work highlights that high levels of complexity and uncertainty can significantly mitigate this possibility. Second, the notion of policy ‘improvement’ suggests the existence of benchmarks (i.e. data) that must be selected and measured. These benchmarks, while potentially useful in isolation, may not be readily comparable across policy objectives; this suggests that EBP per se is unlikely to yield broader policy coordination – even if utilized across all public operations. Regardless, the present argument provides a path for future research to analyse cases of EBP across any number of issues and contexts. I have illustrated the approach by analysing federal homelessness policy in the US. But other examples of EBP – against which this framework’s broader merits can be measured – abound.

## Notes

1. A partial exception is Cairney (2016), who explicitly suggests a place for ‘policy entrepreneurs’ in relation to EBP.
2. Critique of this view traces all the way back to Adam Smith, who wrote of ‘the man of the system’ in *The Theory of Moral Sentiments* ((1759) 1976). The man of the system is one who believes he can control outcomes in society in predictable ways. The ‘ideal type’ view of EBP shares much with this man of the system mindset. With each policy iteration, the subjects of policy intervention – individuals and organizations – are expected to respond predictably and without creative, volitional learning and adjustment.
3. This conception has been primarily elaborated in relation to private entrepreneurship (Klein 2008, Foss and Klein 2012).
4. Kirzner’s notion also informs a large literature on entrepreneurial ‘opportunities’ (e.g. Shane and Venkataraman 2000).
5. Roberts and King (1991) explicitly place policy entrepreneurs as ‘outside’ formal positions in government. Kingdon (1984), however, suggests that they can be inside or outside of government proper.
6. Examples provided by Doig and Hargrove (1987) also suggest multiple actors are relevant in public sector entrepreneurship.
7. Within this ideal type, the evidence-based policymaker would be on the technological end of the continuum of human action and not the entrepreneurial end (Harper 1996).
8. Relatedly, Pareto (1935) describes logical (non-logical) action, denoting the presence (absence) of meaningful comparables. ‘Logical action’ is that which can be assessed in terms of prices, profits, and losses, while ‘non-logical action’ affords no readily comparable metric by which to adjudicate alternatives. Wagner and Yazigi (2014) suggest that the policy process entails non-logical action, while the market process entails logical action.
9. The technical definition is ‘an unaccompanied homeless adult with a disabling condition who has either been continuously homeless for a year or more or has had at least four episodes of homelessness in the past three years’ (United States Department of Housing and Urban Development 2008).

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