United States General Accounting Office

GAO

Report to Congressional Committees

July 2000

ANTI-DRUG MEDIA CAMPAIGN

ONDCP Met Most Mandates, but Evaluations of Impact Are Inconclusive

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United States General Accounting Office
Washington, D.C. 20548

General Government Division

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July 31, 2000

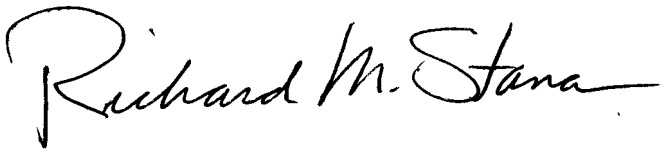
The Honorable Ben Nighthorse Campbell
Chairman
The Honorable Byron L. Dorgan
Ranking Minority Member
Subcommittee on Treasury
and General Government
Committee on Appropriations
United States Senate

The Honorable Jim Kolbe
Chairman
The Honorable Steny Hoyer
Ranking Minority Member
Subcommittee on Treasury, Postal Service,
and General Government
Committee on Appropriations
House of Representatives

The conference report and Senate Appropriations Committee Report for the Treasury and General Government Appropriations Act for 1999 required us to review various aspects of the Office of National Drug Control Policy's (ONDCP) National Youth Anti-Drug Media Campaign. In response to the legislative mandate and discussions with your Subcommittees, this report discusses (1) whether ONDCP provided timely financial reports to Congress; how funds for paid advertising were managed and disbursed; and whether ONDCP complied with certain statutory requirements regarding the obligation of funds; (2) what ONDCP has done to develop and implement guidelines for the Campaign in response to program requirements set out in Public Law 105-61 and Public Law 105-277; and (3) whether the evaluation designs for phases I, II, and III were appropriate; how well the phases I and II evaluations were implemented; and how effective phases I and II of the Campaign were in influencing group awareness of different types of paid anti-drug media messages and drug attitudes. This report contains recommendations to the Director of ONDCP regarding the development and implementation of certain Campaign guidelines.

We are sending copies of this report to the Chairmen and Ranking Minority Members of other appropriate congressional committees; the Honorable Barry R. McCaffrey, Director of the Office of National Drug Control Policy; the Honorable Jacob J. Lew, Director of the Office of Management and Budget; and other interested parties. Copies will also be made available to others upon request.

If you have any questions regarding this report, please call me at (202) 512-8816 or Daniel C. Harris, Assistant Director, at (202) 512-8720. You may also reach us by E-mail at stanar.ggd@gao.gov or harrisd.ggd@gao.gov. The major contributors to this report are listed in appendix IV.



Richard M. Stana
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Justice Issues

Executive Summary

Purpose

The Office of National Drug Control Policy's (ONDCP) National Youth Anti-Drug Media Campaign, which was proposed as a nearly $1 billion federal effort over 5 years, was developed in response to reported increases in drug use among youth in the United States.[1] The conference report[2] and the Senate Appropriations Report[3] for the Treasury and General Government Appropriations Act of 1999 directed GAO to (1) conduct a financial audit and review of the ONDCP Media Campaign, (2) review ONDCP's compliance with certain Campaign program requirements that are listed in the public law, and (3) review certain aspects of the results of phase I of the Campaign (of 3 phases). On the basis of subsequent discussions with the Subcommittee on Treasury and General Government, Senate Committee on Appropriations, and the Subcommittee on Treasury, Postal Service, and General Government, House Committee on Appropriations, GAO agreed to determine

- whether ONDCP provided timely financial reports to Congress as required by Public Law 105-61 and Public Law 105-277; how funds for paid advertising were managed and disbursed; and whether ONDCP complied with certain statutory requirements regarding the obligation of funds;
- what ONDCP has done to develop and implement guidelines for the Campaign in response to the program requirements set out in Public Law 105-61 and Public Law 105-277; and
- whether the evaluation designs for phases I, II, and III were appropriate; how well the phases I and II evaluations were implemented; and how effective phases I and II of the Campaign were in influencing group awareness of different types of paid anti-drug media messages (ad awareness)[4] and drug attitudes.

Results in Brief

ONDCP has complied with most statutory requirements regarding Media Campaign funds and program guidelines, although ONDCP may not be able to fully comply with certain congressional requirements that were enacted after the initial legislation establishing the Campaign. Evaluations of the first two phases of the Campaign remain inconclusive, due to various evaluation survey design and implementation limitations. However, various other indicators, such as the Department of Health and Human Service's Substance Abuse and Mental Health Service Administration's

[1] Public Law 105-61, 111 Stat. 1293, 1294 (1997).

[2] H.R. Conf. Rep. No. 105-825, 1493, 1497 (1998).

[3] S. Rep. No. 105-251, 58-59 (1998).

[4] ONDCP, Testing the Anti-Drug Message in 12 Cities National Youth Drug Media Campaign: Phase I (Report No. 2), p. 2-1, March 1999.

National Clearinghouse for Alcohol and Drug Information (NCADI) data and focus group and community key informant input, support the conclusion that the Campaign was having some positive effects during phases I and II. The phase III evaluation design appears promising; implementation of this phase began in 1999.

In response to statutory financial reporting requirements and certain statutory spending restrictions, ONDCP generally provided timely financial reports to the appropriate Committees and complied with selected statutory spending restrictions imposed by Congress for fiscal years 1998 and 1999. In addition, GAO noted that although ONDCP used administrative contract support from other federal agencies to assist with the paid advertising contracts, it remained responsible for ensuring that only valid Campaign expenses were paid. In doing so, ONDCP had processes in place to monitor and approve all paid advertising expenditures before paying vendors and reporting to Congress.

ONDCP's success in meeting the congressionally mandated program requirements was mixed. The match program, which was developed during phase I of the Campaign to meet the congressional requirement that ONDCP supplement existing public service announcements (PSA), resulted in over 265,000 pro bono or "match" PSAs. However, due to the need to meet the Campaign's reach and frequency goals, ONDCP may not be able to meet the current congressional direction that it obtain a pro bono match as a part of each buy from every vendor. This requirement was imposed after the development of the match program. Contractor officials explained that some vendors were unwilling or financially unable to provide a match. In some of these cases, it was necessary to make a purchase without the match so that ONDCP could meet the Campaign's reach and frequency goals in that market. GAO is making a recommendation in this report to help address this conflict.

According to ONDCP, its work with community anti-drug coalitions was limited in the first two phases of the Campaign due to ONDCP's need to focus efforts on planning and executing the paid advertising Campaign. However, ONDCP and contractors planned and/or initiated numerous initiatives for phase III.

As of the date of GAO's review, ONDCP had not developed a plan to secure private sector contributions. ONDCP had anticipated having a plan in place by October 2000 but, as of the date of GAO's review, had fallen behind in meeting the schedule necessary to complete work by that date. ONDCP officials told GAO that they do not believe they will ever be able to attain

the highest level of the congressionally mandated levels of contributions, which range from 40 to 100 percent of the annual Campaign appropriations for fiscal years 1999 through 2002. GAO is making a recommendation in this report to help clarify this matter.

ONDCP (1) developed policy and guidance prohibiting advertisements that feature political figures or partisan political purposes and (2) established an advertisement review process. However, ONDCP had no internal controls requiring that the reviews be documented. GAO is making a recommendation in this report to correct this situation.

The results of the phases I and II evaluations regarding the Campaign's impact on youth, teen, and parent ad awareness and drug attitudes were inconclusive due to various design, implementation, and analytical limitations. Site selection problems, unknown parent response rates, low school response rates, and data analysis issues contributed to the inconclusive youth, teen, and parent survey data. However, unweighted findings from phases I and II, input from community sources, and data from NCADI provided indications that the initial phases of the Campaign had some positive effects. The 4-year, phase III evaluation began in 1999, and its design appears promising, given its more comprehensive scope and methodological sophistication. In addition, Ogilvy and Mather, the phase III advertising contractor, is to examine the impact of each media element, and NCADI is to continue to collect data through the end of calendar year 2000 on the volume of public contacts and reports distributed as supplemental measures of Campaign awareness/exposure.

ONDCP officials reviewed a draft of this report and generally agreed with its findings, conclusions, and recommendations.

Background

In the Treasury and General Government Appropriations Act for 1998, Congress required that ONDCP submit a campaign strategy for approval to the Committees on Appropriations and the Senate Judiciary Committee that included the following requirements:

- guidelines to ensure and certify that funds will supplement and not supplant current anti-drug community-based coalitions and current pro bono public service time donated by national and local broadcasting networks;
- guidelines to ensure and certify that funds are not used for partisan political purposes and that funded advertisements do not feature any elected officials, persons seeking elected office, cabinet-level officials, or

certain other federal officials, absent advance notice to the respective congressional Committees;

- a detailed implementation plan is to be submitted to the Committees for securing private sector contributions, including but not limited to in-kind contributions;
- a detailed implementation plan is to be submitted to the Committees stating the qualifications that are necessary for any organization, entity, or individual to receive funding for or otherwise be provided broadcast media time; and
- a system is to be developed to measure outcomes of success of the Media Campaign.

The act further required that the Director of ONDCP report to Congress quarterly on the obligation of funds, as well as specific parameters of the Campaign, and report to Congress within 2 years on the effectiveness of the Campaign. In addition, the act placed certain restrictions on the obligation of Campaign funds.

In fiscal year 1999, Congress placed additional requirements in the Campaign's appropriations acts regarding financial reporting; obligation of funds; public service time (requiring ONDCP to obtain a pro bono match as a part of each buy from every vendor); private sector contributions (requiring ONDCP to obtain contributions ranging from 40 to 100 percent of the annual Campaign appropriations for fiscal years 1999 through 2002, respectively); and other aspects of the Campaign. In fiscal year 2000, Congress required that ONDCP not obligate 10 percent of available funds until it submitted a plan for corporate sponsorship to the Appropriations Committees.

In response to the previously mentioned requirements, ONDCP submitted a Campaign strategy to the appropriate Committees in November 1997 and, as requested by the Committees, provided additional information in early 1998. In addition, ONDCP officials provided Congress with oral reports regarding spending during the early months of the Campaign and, in May 1998, began providing periodic written reports on Campaign obligations and expenditures. These officials also provided impact evaluation reports regarding Campaign effectiveness in August 1998, September 1998, March 1999, and June 1999.

The centerpiece of the Campaign is the paid advertising effort in which Campaign funds are used to purchase media time and space for advertisements that deliver anti-drug messages to the Campaign's target audiences. The initial reach and frequency goal for the paid advertising

component was to reach 90 percent of the target audiences with at least four messages a week, across all types of media.[5]

The Campaign is being implemented in the following three phases:

- Phase I, a 12-city pilot focused on paid advertising with very limited implementation of the other Campaign components, ran from January 1998 through July 1998.
- Phase II, a nationwide extension of the pilot to include all media types and very limited implementation of the other Campaign components, ran from July 1998 through December 1998.
- Phase III, a continuation of the nationwide advertising Campaign with expanded implementation of the other Campaign components, is to run from January 1999 through December 2002.

ONDCP uses advertising contractors to obtain the media planning, purchasing, and other advertising expertise that is necessary to conduct the paid advertising component of the Campaign. Paid advertising includes national and local television, radio, and cable and newspaper, magazine, and Internet advertisements, among others. During fiscal years 1998 and 1999, paid advertising accounted for approximately 84 percent of the total Campaign expenditures that ONDCP reported to Congress.

ONDCP also relied on other federal agencies for administrative contract support. However, ONDCP remained responsible for ensuring that the contractors' performance met the advertising objectives of the Campaign. This responsibility included selecting contractors, ensuring that contracts and related modifications were in accordance with ONDCP's media plan, and authorizing payment of the various media advertising costs.

In performing its review, GAO did not

- verify the accuracy of the financial reports provided to Congress or other financial information provided;
- test ONDCP's processes to oversee paid advertising spending to ensure that the procedures were effective and properly implemented;
- review the documents supporting every Campaign obligation;
- review ONDCP's compliance with other statutory spending requirements, such as restrictions regarding the type of activities for which Campaign funds may or may not be used;

[5] "Reach and frequency goal" refers to communicating the message to a certain percentage of the target audiences a certain number of times a week.

- verify the accuracy of the youth, teen, and parent survey response data that were collected in phases I and II, or that of the NCADI and community informant data obtained; and
- conduct a detailed assessment of ONDCP's phases I and II qualitative evaluations (e.g., focus groups and key informant interviews); instead, GAO focused on the quantitative youth, teen, and parent evaluations since these were ONDCP's focus.

Principal Findings

ONDCP Generally Provided Timely Financial Reports and Obligated Funds According to Selected Statutory Restrictions

In response to statutory financial reporting requirements, ONDCP generally provided timely financial reports to the Committees. ONDCP provided oral reports during the early months of the Campaign and provided its first written report, covering the first 8 months of the Campaign, in May 1998. Since then, ONDCP provided timely written financial status reports on a monthly basis, except in October, November, and December, 1998, and October 1999 because of delays in closing the accounting records for one fiscal year and opening records for the new fiscal year. The reports provided cumulative obligations and expenditures. Although not statutorily required to submit reports in fiscal year 2000, ONDCP plans to do so. However, neither written nor oral reports have been issued in fiscal year 2000 to date, due to delays associated with (1) upgrading the Executive Office of the President's financial accounting system that maintains the accounting records and (2) ONDCP's plans to change the financial report's format.

ONDCP had processes in place to monitor and approve all paid advertising expenditures before paying vendors and reporting to Congress. ONDCP uses advertising contractors to carry out the paid advertising portion of the Campaign. These contracts accounted for about 84 percent of the total Campaign expenditures as of September 30, 1999. ONDCP used contract support agents to assist them with these contracts but remained responsible for ensuring that only valid Campaign expenses were paid.

ONDCP complied with selected statutory spending restrictions that were imposed by Congress for fiscal years 1998 and 1999. In fiscal year 1998, ONDCP was not to obligate Campaign funds before submitting a Campaign strategy for approval to the Appropriations Committees and the Senate Judiciary Committee. Additionally, obligation of $17 million before September 30, 1999, was restricted. ONDCP submitted a strategy to Congress in November 1997 and by December 10, 1997, received approval

to begin obligating funds. On the basis of GAO's review of contracts and other obligating documents representing 91 percent of the 1998 appropriation available for obligation, the first obligation of the Campaign was incurred on December 18, 1997. The Office of Management and Budget did not apportion $17 million until after the end of fiscal year 1998 to ensure compliance with that restriction. In fiscal year 1999, ONDCP was prohibited from obligating (1) funds before ONDCP had submitted a report on the evaluation and results of phase I of the Campaign to the Appropriations Committees and (2) more than 75 percent of Campaign funds before submitting a report on phase II. GAO's review of contracts and other obligating documents, representing 94 percent of the 1999 appropriation, indicated that ONDCP complied with these restrictions.

ONDCP is required to hold back 10 percent of the fiscal year 2000 appropriation until ONDCP submits a corporate sponsorship plan to the Appropriations Committees. ONDCP officials said that they would monitor compliance with this restriction.

Compliance With Statutory Program Requirements Was Mixed

To meet the congressional requirement that ONDCP supplement existing PSAs, ONDCP developed the match program. Under this program, ONDCP requires its advertising contractors, when purchasing advertising time or space, to obtain either an equivalent value of time and space or an equivalent in-kind contribution, pro bono, for the PSAs of qualifying organizations. This program resulted in over 265,000 free or match PSAs, valued at approximately $148 million and benefiting 45 organizations as of the time of GAO's review. GAO's review of advertising company documentation indicated with 95-percent statistical confidence that contractors were successful in achieving at least a 100-percent rate of match-to-paid advertising value. However, due to the need to meet the advertising Campaign's reach and frequency goals, ONDCP may not be able to meet the current congressional direction that it obtain a pro bono match as a part of each buy from every vendor. This requirement was imposed after the development of the match program. Contractor officials explained that some vendors were unwilling or financially unable to provide a match, or free airtime. In some of these cases, it was necessary to make a purchase without the match so that ONDCP could meet the Campaign's reach and frequency goals in that market. According to the contractors, for the time period covering June 29, 1998, to December 31, 1999, time and space were purchased from 2,991 media vendors. Of this

total, the contractors made purchases from 12 vendors who did not provide a match.[6]

According to ONDCP, its work with community anti-drug coalitions was somewhat limited in the first two phases of the Campaign, due to the need to focus efforts on planning and executing the paid advertising Campaign. During phases I and II, most of ONDCP's time was directed at getting the paid advertising out in the 12 pilot cities and then expanding the effort nationally. According to ONDCP, phase III will provide the opportunity to fully develop and implement work with community anti-drug coalitions. ONDCP and nonadvertising contractors planned and/or instituted numerous initiatives for phase III.

As of the date of GAO's review, ONDCP had not developed a plan to secure private sector contributions. According to ONDCP officials, a plan developed by a contractor in 1998 was not implemented for several reasons, including (1) legal difficulties with the contract, (2) the ONDCP belief that it might be possible to develop a better plan, (3) the need to plan and execute the paid advertising segment of the Campaign, and (4) ONDCP staffing limitations. ONDCP anticipated having a plan in place by October 2000 but, as of the date of GAO's review, fell behind in meeting the schedule necessary to complete work by that date. Even without a plan, as of the date of GAO's review, ONDCP reported contributions valued at an estimated $71.7 million. Beginning in fiscal year 1999, Congress directed ONDCP to develop a plan to secure contributions equaling 40 to 100 percent of the Campaign's annual appropriations for fiscal years 1999 through 2002. Officials told GAO that even when a plan is finalized, ONDCP might not be able to attain these congressionally mandated levels of contributions. ONDCP plans to learn more about the availability of private sector contributions as it goes through the process of obtaining a contractor to implement a contributions plan.

ONDCP and the Partnership for a Drug-Free America (PDFA) developed guidance prohibiting advertisements that feature political figures or partisan political purposes and established an advertisement review process. Advertising agencies must submit proposed advertisements to PDFA's Creative Review Committee (CRC), which is to review the advertisements following a 29-step process. None of these steps address the prohibition on political figures or partisan purposes. CRC recommendations are to be documented in a creative status report. This

[6] The overall match rate exceeded 100 percent because some media vendors provided a match in excess of a dollar-for-dollar value.

report does not require documentation of review for political figures or partisan content. The final review is to be made in ONDCP's Office of Legal Counsel. These reviews are not documented. The Comptroller General's Standards for Internal Control in the Federal Government (GAO/AIMD-00-21.3.1) requires that all transactions and significant events are to be clearly documented, and that the documentation is to be readily available for examination.

Phases I and II Evaluations Were Inconclusive; Phase III Evaluation Design Appeared Promising

Phases I and II principally focused on testing the impact of the Media Campaign on youth, teen, and parent ad awareness at the local and national levels, respectively. Ad awareness and other outcome results for those phases of the Campaign were inconclusive for each of the three groups, due to several design, implementation, and analytical limitations.

These limitations included site selection problems, unknown parent response rates, low school response rates, ad awareness measurement problems, and data weighting issues. Four of the 12 comparison sites dropped out of the phase I study; of these 4 sites, 2 did not have comparable replacements. School response rates for youth and teens in phase II were less than 30 percent; comparison site school response rates in phase I were less than 50 percent. Ad awareness was not based on viewing all types of Campaign advertisements—but instead focused exclusively on television advertisements.

Other data sources provided evidence that the Campaign had some positive effects during phases I and II. NCADI demonstrated increased public contacts and publication distribution during the Campaign, as compared with the pre-Campaign period. Community sources credited the Campaign with fostering several anti-drug activities and changes in their localities. In addition, GAO's examination of unweighted survey data for phases I and II showed some positive gains on most ad awareness items. In addition, the phases I and II data did not show any significant changes in respondents' drug attitudes.

The 4-year, phase III evaluation design appeared more promising than the previous phases in being able to effectively assess the impact of the Campaign. A comprehensive model of the relationship between media exposure and drug attitudinal and behavioral change was being tested for the first time in phase III. The respondent sampling design overcame some of the limitations of phases I and II—including the use of household surveys to increase response rates, rather than school and telephone interviews. The phase III measurement of advertisement exposure is much more inclusive than the measure of ad awareness in phases I and II

because the measurement includes both lagged[7] and historic trend analyses, rather than just percentage change scores. In addition, Ogilvy and Mather are to conduct an ongoing phase III assessment of the impact of each media element relevant to cost, in order to maximize the effectiveness of the Campaign. Finally, NCADI is to continue collecting data on public contacts and publication distribution as supplemental measures of ad awareness and exposure through the end of calendar year 2000.

Recommendations

To improve ONDCP's compliance with the statutory program requirements, GAO recommends that the Director of ONDCP ensure that the appropriate ONDCP or contractor staff take the following actions:

- To determine the extent to which matches do not occur because of efforts to achieve the Campaign's reach and frequency goals, maintain documentation of all purchases that do not result in a match, including data on why the vendor did not provide a match and why the purchase was made without a match. This information should be provided to Congress to assist in its assessment of the viability of the current congressional direction that ONDCP obtain a match from each and every seller of advertising time and space, given the Campaign's reach and frequency goals.
- After adequate research and consultation with experts, provide information to Congress detailing the anticipated dollar value of all private- sector, nonmatch contributions to assist Congress in its assessment of the viability of the private-sector contributions goals and the dollar value that ONDCP can be expected to obtain from the private sector.
- Develop internal controls, in accordance with the Comptroller General's standards, to ensure that the reviews of new advertisements for political figures or partisan content are fully documented and available for examination.

Agency Comments and GAO's Evaluation

GAO provided a draft of this report to the Director of ONDCP for comment. ONDCP provided written comments, which are discussed at the end of chapters 2, 3, and 4. GAO also provided relevant sections of the draft report to the Department of Defense's Office of the Inspector General and the Department of Health and Human Services' Program Support Center, National Institute on Drug Abuse, and Substance Abuse and Mental Health Services Administration for a review of the facts pertaining to them. These organizations, as well as ONDCP, provided technical or clarifying

[7] "Lagged" analyses refer to the study of changes taking place over time, rather than concurrently.

changes, which have been incorporated, as needed, in the appropriate sections of this report.

Overall, ONDCP agreed with GAO's findings, conclusions, and recommendations. It stated that the report is balanced, with fair assessments and recommendations. ONDCP also said that the draft report could have given greater recognition to various factors that were out of ONDCP's control in implementing the Campaign.

In commenting on GAO's findings and conclusions relating to the financial aspects of the Campaign, ONDCP inferred that GAO conducted a financial audit. It added that internal controls allowed ONDCP to monitor the expenditures and control payments of outside contractors. GAO emphasizes that it did not conduct a standard financial audit of the Campaign's fiscal operations or review the related internal controls. Also, GAO did not conduct a contract management audit or review how the internal controls were applied during the contract administration process.

ONDCP asked GAO to amend the draft report to reflect that ONDCP has submitted to the Appropriations Committees a plan to secure corporate sponsorship. GAO's review of the document, which ONDCP provided with its written comments, led GAO to conclude that it is a blueprint or strategy for ONDCP's acquiring a contractor to develop and implement the plan, rather than the implementation plan itself.[8] Therefore, the requirement to submit to the Appropriations Committees and the Senate Judiciary Committee an implementation plan for securing private sector contributions has not yet been fulfilled.

Concerning the recommendation relating to the match program, ONDCP provided GAO with a copy of a letter addressed to Ogilvy and Mather instructing the contractor to maintain records of instances in which it is unable to obtain a match (see app. III). Assuming this instruction is followed by the contractor, GAO believes it addresses the first part of the recommendation that ONDCP maintain documentation of all purchases that do not result in a match. However, in instructing the contractor that this information should be made available upon request, ONDCP did not address the intent of the second part of the recommendation, that is, that ONDCP proactively provide this information to the Congress. As a result, GAO is retaining its recommendation.

[8] The Fiscal Year 1998 Treasury and General Government Appropriations Act required ONDCP to submit to the Appropriations Committees and the Senate Judiciary Committee a detailed implementation plan for securing private sector contributions, including but not limited to in-kind contributions.

In response to GAO's recommendation that ONDCP formalize the review of new advertisements for political figures or partisan content, ONDCP stated that it would do so by requiring that the required legal reviews be documented. Since this action has not yet been taken, GAO is retaining this recommendation.

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Abbreviations

AAF	American Advertising Federation
CADCA	Community Anti-Drug Coalitions of America
CiC	Cable in the Classroom
CLSPY	Community Longitudinal Survey of Parents and Youth
COR	Contracting Officer's Representatives
CRC	Creative Review Committee
DOD	Department of Defense
EOP	Executive Office of the President
FFA	Future Farmers of America
HHS	Department of Health and Human Services
JRAP	Joint Recruiting and Advertising Program
MTF	Monitoring the Future
NASADAD	National Association of State Alcohol and Drug Abuse Directors
NCADI	National Clearinghouse for Alcohol and Drug Information
NDPL	National Drug Prevention League
NEA	National Education Association
NHSDA	National Household Survey on Drug Abuse
NIDA	National Institute on Drug Abuse
NNN	Newspaper National Network
NPN	National Prevention Network
NSPY	National Survey of Parents and Youth
OMB	Office of Management and Budget
ONDCP	Office of National Drug Control Policy
PAS	Print Audit Service
PDFA	Partnership for a Drug-Free America
PSA	public service announcement
PSC	Program Support Center (Health and Human Services)
PTSA	Prevention Through Service Alliance
RFI	Request for Information
RFP	Request for Proposal
SAMHSA	Substance Abuse and Mental Health Services Administration
SHRM	Society for Human Resource Management
YSA	Youth Service America

Introduction

The Office of National Drug Control Policy's (ONDCP) National Youth Anti-Drug Media Campaign, which was proposed as a nearly $1 billion federal effort over 5 years, was developed in response to reported increases in drug use among youth in the United States. The Media Campaign's goals are to (1) educate and enable youth to reject illegal drugs, (2) prevent youth from initiating the use of drugs, and (3) convince occasional users to stop using illegal drugs. The Campaign supports the first goal of the 1999 National Drug Control Strategy, which is to educate and enable America's youth to reject illegal drugs as well as alcohol and tobacco.[1]

Media Campaign Appropriations and Statutory Requirements

In the Treasury and General Government Appropriations Act for 1998, Congress authorized ONDCP to undertake a national Media Campaign to reduce and prevent drug use among youth.[2] The initial appropriation for the Campaign was $195 million. An additional $185 million were appropriated in the fiscal year 1999 Appropriations Act[3] and in the fiscal year 2000 Appropriations Act.[4]

As part of its fiscal year 1998 appropriation, Congress mandated that ONDCP submit a Campaign strategy for approval to the Appropriations Committees and the Senate Judiciary Committee. The Campaign strategy was to include the following requirements:

- guidelines to ensure and certify that funds will supplement and not supplant current anti-drug community-based coalitions;
- guidelines to ensure and certify that funds will supplement and not supplant current pro bono public service time that is donated by national and local broadcasting networks;
- guidelines to ensure and certify that the funds will not be used for partisan political purposes;
- guidelines to ensure and certify that no media campaigns to be funded pursuant to this Campaign shall feature any elected officials, persons seeking elected office, cabinet-level officials, or other federal officials employed pursuant to Schedule C of title 5, Code of Federal Regulations, section 213, absent advance notice to the Appropriations Committees and the Senate Judiciary Committee;

[1] The National Drug Control Strategy, 1999, ONDCP.

[2] Public Law 105-61, 111 Stat. 1293, 1294 (1997).

[3] Public Law 105-277, 112 Stat. 2681-496 (1998).

[4] Public Law 106-58, 113 Stat. 447, 448 (1999).

- a detailed implementation plan to be submitted to the Appropriations Committees and the Senate Judiciary Committee for securing private sector contributions, including, but not limited to, in-kind contributions;
- a detailed implementation plan to be submitted to the Appropriations Committees and the Senate Judiciary Committee of qualifications that are necessary for any organization, entity, or individual to receive funding for or otherwise be provided with broadcast media time; and
- a system to measure outcomes of success of the Campaign.

The act further required that the Director report to Congress quarterly on the obligation of funds, as well as specific parameters of the Campaign, and report to Congress within 2 years on the effectiveness of the Campaign on the basis of measurable outcomes previously provided to Congress. In addition, the act placed a restriction on the obligation of Campaign funds.

Subsequently, as discussed in chapters 2 and 3, in fiscal year 1999, Congress placed additional requirements on ONDCP in the Campaign's appropriations acts regarding financial reporting, obligation of funds, public service time, private sector contributions, and other aspects of the Campaign. In fiscal year 2000, Congress required that ONDCP not obligate 10 percent of its available funds until ONDCP had submitted a plan for corporate sponsorship to the Appropriations Committees.

In response to these requirements, ONDCP submitted a Campaign strategy to the appropriate Committees in November 1997 and, as requested by the Committees, provided additional information in early 1998. In addition, ONDCP officials provided oral reports to Congress regarding spending during the early months of the Campaign and began providing written reports on Campaign obligations and expenditures in May 1998. They also provided impact evaluation reports regarding Campaign effectiveness in August 1998, September 1998, March 1999, and June 1999.

Campaign Strategy and Implementation

Initially, ONDCP and a contractor, Porter Novelli, developed a communication strategy to establish the overall Campaign direction and to guide the development of specific Campaign messages, materials, and activities. According to the communication strategy, the focus of the Campaign is to promote primary prevention—that is, to prevent drug abuse before it starts. In general, the Campaign is intended to counteract messages and images in the popular culture that glamorize, legitimize, normalize, or otherwise condone drug use. Youth aged 9 to18 years, primarily 11 to 13 year olds; parents and other primary caregivers; and other adults who influence youth are targeted by the Campaign. Campaign messages are to accurately depict drug use and its consequences,

encourage parents to discuss drug abuse with children, and foster other message strategies as outlined in the communications strategy.

The centerpiece of the Campaign is the paid advertising effort in which Campaign funds are to be used to purchase media time and space for advertisements that deliver anti-drug messages to the Campaign's target audiences. The initial reach and frequency goal, which ONDCP established for the paid advertising component, was to reach 90 percent of the target audiences with at least four messages a week, across all media types.[5] Advertisements are to be produced in 11 languages to communicate to youth and adults of major ethnic groups, including Hispanics, Asian Americans, and Pacific Islanders.

The Campaign has five other key components, as follows, that support the advertising effort:

- interactive media,
- entertainment industry collaboration,
- public information/news media,
- partnerships/community participation, and
- corporate participation.

The Campaign is being implemented in three phases. Table 1.1 illustrates the scope, time period, and focus for each phase.

[5] "Reach and frequency goal" refers to communicating the message to a certain percentage of the target audiences a certain number of times a week.

Table 1.1: Campaign Phases

Phase	Scope	Time period	Focus
I	12-city pilot	January-July, 1998	Paid advertising—local television and radio. Very limited implementation of the additional five Campaign components.
II	Nationwide, 102 media markets	July-December, 1998	Expansion of paid advertising to include all media types. Very limited implementation of the additional five Campaign components.
III	Nationwide, 102 media markets	January 1999-December 2002[a]	Continuation of paid advertising. Expansion of the additional five Campaign components.

[a]There was a transition period of several months between phases II and III. As a result, the fully integrated Campaign did not start until the summer of 1999.

Source: ONDCP.

Campaign Structure

ONDCP has overall responsibility for developing and implementing the Media Campaign. However, as directed by the congressional conferees,[6] ONDCP consults with media and drug experts, such as The Advertising Council, Inc. (Ad Council), and the Partnership for a Drug-Free America (PDFA). In addition, ONDCP has worked with other federal entities, private businesses, nonprofit organizations, and trade associations to obtain support for various aspects of the Campaign—from initial Campaign design to evaluation.

Table 1.2 lists the organizations that support the Campaign and that are discussed in this report. The table provides the organizations' name, type, work description, and role in the Campaign.

[6] H.R. Conf. Rep. No. 105-284 at 67 (1997).

Table 1.2: Descriptions and Roles of Organizations Involved in the Media Campaign

Organization	Type	Description and role in Media Campaign
The Advertising Council, Inc.	Nonprofit organization	Provides public service communications for nonprofit organizations. Serves as the clearinghouse for the organizations and public service announcements (PSAs) submitted by nonprofit groups and government organizations for consideration as part of the Campaign's national-level media match program. Also assists the Campaign in recruiting volunteers for anti-drug coalitions and reviews production costs for new Campaign advertisements.
The American Advertising Federation	Trade association	Professional advertising association of corporate advertisers, agencies, media companies, suppliers, and academia. Oversees all screening and approval of local organizations and PSAs for participation in the local-level match program.
Bates Advertising USA, Inc.	Private business	Phases I and II paid advertising contractor. Efforts included (1) media planning and purchasing of media time and space from various media vendors and (2) oversight, negotiation, and implementation of the Campaign's media match program.
Community Anti-Drug Coalitions of America	Nonprofit organization	National organization of anti-drug coalitions that supports community-based strategies for substance abuse prevention, to promote drug-free communities. Assists the Campaign in developing process evaluation measures to assess the impact of the Campaign on community-based, anti-drug efforts and in developing partnerships at the community level to enhance and leverage Campaign messages. Also, inquiries generated from Campaign advertisements in certain areas are referred to these coalitions and their network of community resources. Assisted in surveying its member coalitions to report impacts on community organizations from phase I advertisements.
Cox and Associates, CPAs, P.C.	Private business	Accounting agency. Provides financial management support, such as invoice processing and development of a Campaign financial and program information tracking system.
CSR, Inc.	Private business	Policy research, training, and management services organization. Campaign evaluation contractor for phases I and II.
Department of Defense (DOD), Defense Manpower Data Center Joint Advertising and Market Research Division	Federal agency	Oversees DOD's Joint Recruiting and Advertising Program, which, along with its contracting office, the Defense Supply Service, Washington, provided administrative contract support for phase I paid advertising efforts by issuing a task order under its existing contract with Bates Advertising USA, Inc.
Department of Health and Human Services' Program Support Center	Federal agency	Among other things, provides contracting support to other federal agencies on a fee-for-service basis. Provides administrative contract support for phases II and III paid and nonpaid advertising efforts through advertising and awarding Campaign contracts (e.g., Bates Advertising USA, Inc.; Ogilvy and Mather; and Fleishman-Hillard, Inc.)
Department of Health and Human Services' Substance Abuse and Mental Health Services Administration (SAMHSA)	Federal agency	Mission is to improve the quality and availability of prevention and treatment and rehabilitation services for substance abuse and mental health. Provided a qualitative analysis of the impact of phase I and identified ways to amplify the impact of phase I as the Campaign expands nationally.

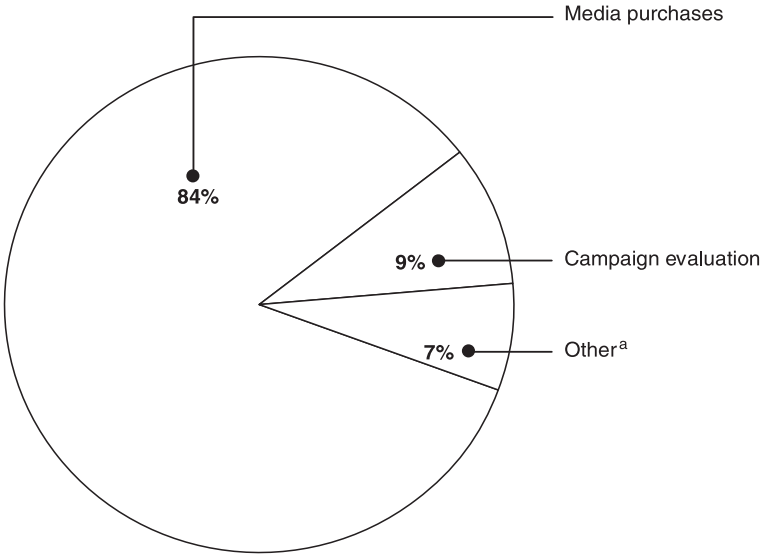
Organization	Type	Description and role in Media Campaign
Fleishman-Hillard, Inc.	Private business	Phase III nonpaid advertising contractor. Assists with interactive media, entertainment industry collaboration, public information/news media, and partnerships.
National Association of State Alcohol and Drug Abuse Directors	Nonprofit organization	National association to foster and support the development of effective alcohol and other drug abuse prevention and treatment programs throughout every state. Assists The American Advertising Federation with its local media match activities, and, through a hotline and clearinghouse, responds to inquiries generated by Campaign advertisements.
National Clearinghouse for Alcohol and Drug Information	Federal agency	SAMHSA's information service, which, upon request, provides current information and materials concerning substance abuse. Collecting public contact and publication distribution data for the phases I, II, and III evaluations.
National Drug Prevention League	Nonprofit organization	An association of 30 national and major regional private sector organizations for drug abuse prevention. Assisting ONDCP in identifying the capacities and key points of contact for drug prevention among civic and community organizations across the country.
National Institute on Drug Abuse	Federal agency	Funds 85 percent of the world's drug abuse research. Conducting the phase III evaluation on behalf of ONDCP, to ensure state-of-the-science methods and analytic procedures and the integrity and independence of the results.
Ogilvy and Mather	Private business	Phase III paid advertising contractor. Efforts include (1) media planning and purchasing of media time and space from various media vendors and (2) oversight, negotiation, and implementation of the Campaign's media match program.
The Partnership for a Drug-Free America	Nonprofit organization	Coalition of professionals from the communications industry. Oversees and implements the creation of all paid advertisements used in the Campaign.
Porter Novelli	Private business	Strategic communications planning firm. Provided general advertising and Campaign expertise and assisted ONDCP in developing the overall communication strategy.
Westat	Private business	Research organization. Phase III Campaign evaluation contractor.
Zenith Media Services, Inc.	Private business	Phases I and II subcontractor under Bates Advertising USA, Inc. Purchased media time and space from all national and local broadcast vendors, except purchases directed at specific ethnic markets.

Source: ONDCP.

ONDCP Uses Advertising Contractors and Contract Support Agents for Paid Advertisements

ONDCP uses advertising contractors to obtain the media planning, purchasing, and other advertising expertise necessary to carry out its statutory responsibilities for conducting the paid advertising component of the Media Campaign. Media purchases include national and local television, radio, and cable and newspaper, magazine, and Internet advertisements, among others. As shown in figure 1.1, payments to the advertising contractors for media planning and purchasing accounted for approximately 84 percent of the total Campaign expenditures for the first 2 years of the Campaign that ONDCP reported to Congress.

Figure 1.1: Total Media Campaign Expenditures, as of September 30, 1999



[a]Includes expenditures for activities such as research, consulting, and clearinghouse services.

Source: GAO analysis of ONDCP Obligation and Expenditure Report to Congress, as of September 30, 1999.

From the Campaign's inception, ONDCP relied on other federal agencies to provide administrative contract support for the Campaign's paid advertising contracts. Administrative contract support included, among other things, managing the contracting process through solicitation and selection; awarding the contract; and overseeing the execution of the contract, including reviewing vouchers against the contract's limit. Although ONDCP used administrative contract support from other agencies, it remained responsible for ensuring that the contractors' performance met the advertising objectives of the Campaign. This responsibility included selecting the contractors, ensuring those contracts and related modifications were in accordance with ONDCP's media plan, and authorizing payment of media advertising costs.

ONDCP officials told us that because of the potentially high demands of the Campaign, ONDCP initially decided that neither ONDCP nor the Executive Office of the President (EOP) had the capabilities necessary to support the contracting efforts needed to undertake the Campaign's paid advertising efforts. In November 1997, ONDCP entered into an interagency agreement with the Defense Manpower Data Center Joint Advertising and Market Research Division, which handles the Department of Defense's (DOD) Joint Recruiting and Advertising Program (JRAP), to provide

administrative contract support services for the phase I paid advertising efforts. JRAP's contracting office, the Defense Supply Service, Washington, had an existing contract with a large advertising agency, Bates Advertising USA, Inc. (Bates), which could provide services for other federal agencies. As a result, the Defense Supply Service, Washington, issued a task order for the phase I paid advertising, with subsequent modifications, totaling $23 million under its existing contract. ONDCP paid for the costs associated with running the advertisements, but DOD did not charge ONDCP for its efforts in administering the contract. Upon completion of the phase I Campaign efforts, according to ONDCP officials, ONDCP did not renew its agreement with JRAP because ONDCP always intended for DOD's existing contract to be used only as a temporary vehicle to quickly initiate the Campaign.

In April 1998, ONDCP entered into an agency reimbursable work agreement with the Department of Health and Human Services' (HHS) Program Support Center (PSC) to provide administrative contract support for the phase II paid advertising efforts, including award of the contract to an advertising agency. In May 1998, HHS issued a contract to Bates, the same contractor that was used for phase I,[7] for about $120 million, which was subsequently modified to about $140 million for additional media purchases.

In December 1998, the HHS agreement was amended to cover phase III paid advertising efforts through December 1999. HHS issued a contract for about $129 million in December 1998 to Ogilvy and Mather for phase III of the Campaign.[8] The phase III contract was issued for 1 year, with four 1-year options to cover the entire Campaign. In January 2000, HHS and ONDCP entered into another agreement to cover the first option year under the contract, and HHS issued a contract modification for about $133 million to Ogilvy and Mather to extend the contract through January 3, 2001.

PSC provides administrative support services on a fee-for-service basis to HHS components and other federal agencies. As of February 2000, ONDCP

[7] According to ONDCP and HHS officials, a sole-source contract was issued to Bates, in part, to prevent disruption in the advertising Campaign as it transitioned from a 12-city pilot program in phase I to a national Campaign in phase II.

[8] According to ONDCP and HHS, a full-and-open competition was conducted to select the phase III contractor.

had agreed to pay PSC about $604,000 for services supporting ONDCP Campaign contracts.[9]

Although ONDCP used administrative contract support from other federal agencies, it remained responsible for monitoring the contractors' costs for paid advertising. (See ch. 2 for more information regarding ONDCP's oversight of paid advertisement spending.)

Objectives, Scope, and Methodology

The conference report[10] and the Senate Appropriations Committee Report[11] for the Treasury and General Government Appropriations Act for 1999 directed us to (1) conduct a financial audit and review of the ONDCP National Youth Anti-Drug Media Campaign, (2) review ONDCP's compliance with certain program requirements listed in the public law, and (3) review certain aspects of the phase I results. On the basis of subsequent discussions with staff from the Subcommittee on Treasury and General Government, Senate Committee on Appropriations, and the Subcommittee on Treasury, Postal Service, and General Government, House Committee on Appropriations, we agreed to determine the following:

- whether ONDCP provided timely financial reports to Congress as required by Public Law 105-61 and Public Law 105-277; how funds for paid advertising were managed and disbursed; and whether ONDCP complied with certain statutory requirements regarding the obligation of funds;
- what ONDCP has done to develop and implement guidelines for the Campaign in response to the program requirements set out in Public Law 105-61 and Public Law 105-277; and
- whether the evaluation designs for phases I, II, and III were appropriate; how well the phases I and II evaluations were implemented; and how effective phases I and II of the Campaign were in influencing group awareness of different types of paid anti-drug media messages (ad awareness)[12] and drug attitudes.

[9] ONDCP agreed to pay PSC, in addition, about $156,000 for other contracts that supported its advertising efforts (e.g., consulting) and about $412,000 for nonadvertising Campaign contracts. Thus, the total PSC fees agreed to by ONDCP to support the Campaign, as of February 2000, were about $1,172,000.

[10] H.R. Conf. Rep. No. 105-825 1493, 1497 (1998).

[11] S. Rep. No. 105-251, 58-59 (1998).

[12] ONDCP, Testing the Anti-Drug Message in 12 Cities National Youth National Drug Media Campaign: Phase I (Report No. 2), p. 2-1, March 1999.

We did not conduct a financial audit of the Campaign's fiscal operations or review the related internal controls. Also, we did not conduct a contract management audit, that is, we did not review the contract award process or review how the internal controls were applied during the contract administration process.

To review the timeliness of ONDCP's financial reporting, we collected and examined pertinent ONDCP and EOP documents, including the monthly written reports on obligations and expenditures that were submitted to Congress, and the fiscal years 1998, 1999, and 2000 Treasury and General Government Appropriations Acts. We also interviewed ONDCP and EOP officials, as agreed with the Subcommittee staffs. We did not, however, verify the accuracy of the financial information reported.

To describe how funds for paid advertising were managed and disbursed, we (1) gained an understanding of ONDCP's use of contractors and contract support agents for its paid advertising efforts and (2) examined the paid advertising invoicing process from invoice preparation by the contractor to final payment and expenditure reporting to Congress. We collected and reviewed pertinent EOP, ONDCP, DOD, HHS, and contractor documents, such as contracts, interagency agreements, invoices, and supporting documentation (e.g., media vendor billings). In addition, we also interviewed EOP, ONDCP, DOD, HHS, the contractors, and the subcontractor officials. However, as agreed, we did not test ONDCP's processes to oversee paid advertisement spending to ensure that the procedures were effective and properly implemented.

To review ONDCP's compliance with selected statutory requirements regarding the obligation of funds, we collected and analyzed certain obligating documents, including all Campaign contracts and interagency agreements entered into during fiscal years 1998 and 1999; other pertinent ONDCP documents; and fiscal years 1998, 1999, and 2000 Treasury and General Government Appropriations Acts. However, we did not review the obligating documents supporting every Campaign obligation. For example, we did not review the supporting documents for travel and printing obligations. The obligating documents we reviewed represented about 91 and 94 percent of ONDCP's fiscal years 1998 and 1999 appropriations, respectively. We did not review ONDCP's compliance with other statutory spending requirements, such as restrictions regarding the type of activities for which Campaign funds may and may not be used.

To review ONDCP's development and implementation of guidelines to meet the program requirements listed in Public Law 105-61, we

interviewed officials at the following offices: ONDCP; Bates; Zenith Media Services, Inc. (Zenith); Ogilvy and Mather; the Ad Council; The American Advertising Federation; Fleishman-Hillard; and PDFA. We also collected and analyzed pertinent documents from each of these offices.

In addition, regarding the "match" program, we verified the electronic data provided by ONDCP's phases I and II advertising contractors against their actual supporting documentation. Bates was ONDCP's advertising contractor for phases I and II; Zenith was the subcontractor responsible for the purchase of national and local television, radio, and cable advertisements. Bates and Zenith reported achieving rates of at least 100-percent match value to paid value, that were based on computerized data on paid advertisements and the corresponding matches. In verifying the accuracy of the electronic data provided by the contractors, we focused primarily on the number and size of the errors in the databases. We compared a sample of records from the electronic databases to their supporting documentation, and defined an "error" as any instance when we found a difference of more than $100 that would have inflated the estimate of the percentage of dollars matched. Errors in the electronic data would indicate that the match estimates were questionable; relatively few discrepancies between database and supporting documentation would indicate confidence in the match estimates.

Since the match program covered multiple media types and numerous vendors, we selected all vendors in some media types and samples of vendors in other media types, to reduce data collection time and cost. We asked Bates and Zenith to provide lists of matches negotiated from each media vendor, from the third quarter of 1998 through the first quarter of 1999. We selected all magazine, in-school, and cinema/arcade vendors; all national television and radio vendors (which accounted for 73 percent of the total dollars spent on television and radio advertising); and random samples of 64 local television and radio vendors and 61 newspaper vendors.

We developed a data collection instrument to compare data from the contractors' databases and their supporting documentation. We pretested our data collection instrument, using information related to several vendors, to ensure the reliability of our data collection.

For each vendor, we reviewed database information and the supporting documentation for each paid advertisement and corresponding match. From the contractors' databases, we recorded the number and value of paid advertisements and matches for each vendor. At the offices of Bates

and Zenith, we used several types of supporting documentation, including invoices, insertion orders, print requisition forms, rate cards, vendor agreements, post buy reports, Print Audit Service (PAS) and Newspaper National Network (NNN)[13] reports, and brand/time schedules.

The results from the newspaper and the local television and radio vendors' samples were weighted. The weighting enabled us to make estimates about the total population error rates in the contractors' databases for these vendors. Additionally, since our sample contained vendors that accounted for 73 percent of the total dollars spent on television and radio advertising, we also were able to estimate, with adequate precision, the match advertisement dollars as a percentage of paid advertisements for television and radio.

The estimate for the error rate in Bates' database was 3 percent, with a 95-percent confidence interval of 1 to 7 percent; the estimated error rate in Zenith's database was 2 percent, with a 95-percent confidence interval of less than 1 to 8 percent. This means, for example, that we are 95-percent confident that at least 1 percent of Bates' database records were in error, but that no more than 7 percent of the records were in error. Similarly, we are 95-percent confident that from less than 1 to 8 percent of Zenith's database records were in error.

The estimate for the match program for Bates was 102 percent, with a 95-percent confidence interval of plus or minus 2 percent; the estimate of the percentage match received by Zenith was 115 percent, plus or minus 10 percent. In other words, we are 95-percent confident that Bates received at least a dollar-for-dollar of match-to-paid advertisement value. We are also 95-percent confident that Zenith received a match between 105 and 125 percent.

To determine how appropriate the impact evaluation designs were for determining the effectiveness of phases I, II, and III of the Campaign, we interviewed ONDCP officials and study representatives from the principal evaluation organizations—CSR, Inc., (phases I and II) and the National Institute on Drug Abuse (NIDA) (phase III). We obtained documentation from each of these agencies describing the evaluation designs for each of the three phases, and we submitted oral and/or written questions when we identified concerns or limitations. We also obtained outside reviews from

[13] PAS and NNN are services that, for advertising agencies, verify that newspaper advertisements have been printed as agreed. The data they collect are entered into databases that produce reports sent to the advertising agencies.

experts on the methodological and statistical procedures used in the Campaign (see app. I). The appropriateness of the evaluation designs was based on principles of scientific research, input from outside experts, and our own knowledge base built upon years of scientific research. We also interviewed Ogilvy and Mather officials and obtained documentation related to their phase III econometric study of media impact, to determine the strengths and limitations of the design.

To determine how well the phases I and II evaluations were implemented, we evaluated the phases I and II final reports that ONDCP submitted to Congress, in addition to agency documents regarding specific aspects of the evaluation implementation.[14] We relied on our experience in designing and assessing evaluation methodologies—that is, our experience with generally accepted social science methodological standards and practices. We discussed issues and concerns with ONDCP and CSR and recommended changes to phase I drafts, some of which ONDCP subsequently approved and adopted. We also received written reviews from several outside experts on various aspects of the phases I and II methodological and statistical procedures (see app. I).

To determine how effective phases I and II of the Campaign were in influencing drug ad awareness and drug attitudes, we examined the aggregate and site-specific baseline and follow-up survey data from the 12 target and 12 comparison sites of phase I (see table 4.1). We also examined the baseline and follow-up survey data that were derived from ONDCP's phase II national effort. These data were principally derived from the phases I and II reports to Congress. But, as questions and issues arose, we were able to obtain additional statistical information and documentation from either ONDCP or CSR. In addition, we examined data from the National Clearinghouse for Alcohol and Drug Information (NCADI) to determine the relationship between Campaign intervention and agency contacts and requests for information. Beyond examining the individual data sets, we considered various methodological and statistical issues as they bear on the evaluation results, including site selection procedures, response rates, ad awareness measurement, data weighting procedures, and the representativeness and generalizability of the results.

We performed our work from September 1998 to May 2000 in accordance with generally accepted government auditing standards. In June 2000, we requested comments on a draft of this report from the Director of ONDCP.

[14] Phase III implementation was only beginning at the time we completed our work.

On July 3, 2000, we received written comments from ONDCP, which are discussed at the end of chapters 2, 3, and 4 and reprinted in appendix III.

We also provided relevant sections of the draft report to DOD's Office of the Inspector General, HHS' Program Support Center, NIDA, and the Substance Abuse and Mental Health Services Administration for a review of the facts pertaining to them. These organizations, as well as ONDCP, provided technical or clarifying changes, which have been incorporated, as needed, in the appropriate sections of this report.

ONDCP Generally Provided Timely Financial Reports and Obligated Funds in Accordance With Selected Statutory Restrictions

In response to statutory financial reporting requirements, ONDCP provided oral reports to Congress regarding spending during the early months of the Media Campaign. In May 1998, ONDCP provided its first written financial report to Congress covering the first 8 months of the Campaign. Since then, ONDCP has generally provided timely cumulative written financial status reports on a monthly basis. ONDCP reported spending approximately 84 percent of the total Campaign funds for fiscal years 1998 and 1999 on paid advertising. ONDCP had processes in place to monitor and approve all paid advertising expenditures before paying vendors and reporting to Congress. In addition, our review showed that ONDCP complied with selected spending restrictions imposed by Congress.

As Mandated, ONDCP Generally Provided Timely, Written Financial Reports to Congress Since May 1998

The Treasury and General Government Appropriations Act of 1998[1] required the Director of ONDCP to report to Congress quarterly on the obligation of funds of the Campaign. In December 1997, the Subcommittee on Treasury and General Government, Senate Committee on Appropriations, requested that ONDCP provide a monthly report of all obligations and expenditures of funds associated with the Campaign.[2] Subsequently, the Treasury and General Government Appropriations Act of 1999[3] required ONDCP to report to Congress not only quarterly, but also to provide monthly itemized reports of all obligations and expenditures relating to the Campaign.[4]

Our review of fiscal year 1998 obligations[5] revealed that ONDCP made its first significant financial obligation of the Campaign in December 1997 for paid advertisements. Related disbursements began in March 1998. ONDCP officials said that they communicated orally with the appropriate Committees during the first two quarters of fiscal year 1998, including discussions regarding the Campaign's financial activities.

[1] Public Law 105-61, 111 Stat. 1293, 1295 (1997).

[2] A letter dated December 8, 1997, was sent to ONDCP from the Chairman of the Subcommittee on Treasury and General Government, Senate Committee on Appropriations.

[3] Public Law 105-277, 112 Stat. 2681-497 (1998).

[4] Although the Treasury and General Government Appropriations Act for 2000 (P.L. 106-58) did not contain a reporting requirement, the Senate report on the bill directed ONDCP to submit quarterly reports on the obligation of funds (S. Rep. No. 106-87 at 54).

[5] We reviewed obligating documents representing 91 percent of the fiscal year 1998 Campaign's funds that were available for obligation.

ONDCP provided its first written report to Congress in May 1998. The report included obligations and disbursements for the first 8 months of the Campaign (i.e., from Oct. 1997 to May 1998). According to ONDCP officials, ONDCP previously provided oral reports rather than written reports because (1) there were several administrative tasks to complete in developing the new Campaign, including designing reporting procedures and formats; (2) there were relatively few financial transactions during the first several months of the Campaign; and (3) ONDCP officials believed that their oral reports satisfied the intent of the act's reporting requirements.

Since May 1998, ONDCP generally provided written reports on a monthly basis. The reports included cumulative obligations and expenditures from the inception of the Campaign.[6] According to ONDCP officials, ONDCP did not provide written reports in October, November, and December, 1998,[7] and October 1999[8] because of delays in closing the accounting records for one fiscal year and opening records for the new fiscal year. Although ONDCP is not statutorily required to provide financial reports to Congress in fiscal year 2000, officials stated that they intend to continue to provide financial reports. However, according to ONDCP officials, due to delays associated with upgrading the EOP's financial accounting system that maintains the accounting records and ONDCP's plans to change the report format, no written or oral reports had been issued in fiscal year 2000 at the time of our review. ONDCP plans to issue a report that includes cumulative figures reflecting all activity to date as soon as these two issues are resolved. According to ONDCP officials, the updated report format will be more consistent with how the Campaign's efforts are organized, particularly for paid advertisements.

The fiscal years 1998 and 1999 ONDCP reports detailed the Campaign's operating budget, commitments, obligations, and expenditures by various spending categories, such as program evaluation and paid advertisements. The EOP's Office of Administration maintains the official financial system of record for the Campaign and, therefore, is responsible for preparing the financial reports for ONDCP. However, ONDCP is responsible for ensuring the accuracy of the financial reports. In doing so, ONDCP is to approve all

[6] Each written monthly report includes total obligations and expenditures since the program started, as of the date of the report or the end of the month before the date of the report, as noted.

[7] The subsequent report provided in January 1999 included cumulative figures that reflected activity for the months in which no reports were provided.

[8] In November 1999, ONDCP provided a report on all obligations and expenditures as of September 30, 1999.

Campaign transactions, including all Campaign obligations and expenditures, before their input into EOP's financial management system. We did not conduct a financial audit of the Campaign's fiscal operations or review the related internal controls to determine the accuracy of the Campaign's obligations and expenditures.

ONDCP Established Processes to Oversee Paid Advertisement Spending

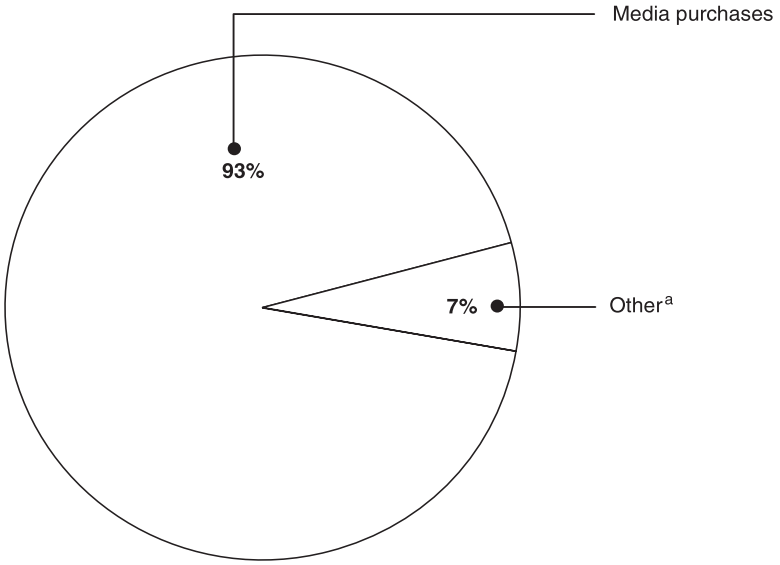
ONDCP uses advertising contractors to carry out its statutory responsibilities for conducting the paid advertising portion of the Campaign. These contractors provide the necessary media planning, purchasing, and other advertising expertise. Paid advertising includes costs associated with radio, television, newspaper, magazine, and Internet advertisements, among others. These paid advertisements are considered the most significant costs of the Campaign. According to ONDCP's financial reports to Congress, during the first 2 years of the Campaign, these contracts accounted for approximately 84 percent of total Campaign expenditures as of September 30, 1999.[9] Although ONDCP used administrative contract support from other federal agencies to assist them with the advertising contracts, ONDCP remained responsible for ensuring that only valid Campaign expenses were paid. ONDCP is to review all invoices from paid advertisement contractors and recommend payment or nonpayment to HHS. We did not conduct a contract management audit or review how the internal controls were applied during the contract administration process.

From its inception, ONDCP relied on other federal agencies to provide administrative contract support for the Campaign's paid advertising contracts. Administrative contract support included, among other things, overseeing the execution of the contract (e.g., reviewing invoices against the contract's limit).[10] As shown in figure 2.1, the majority of ONDCP's expenditures under these advertising contracts were for purchasing time and space for anti-drug advertisements from various media vendors, including radio and television broadcasters, newspapers, magazines, and Internet providers, among others. Expenditures under the advertising contracts were also made for activities such as advertising production and labor.

[9] The remaining 16 percent of the Campaign expenditures included Campaign evaluation expenditures and those for other activities, such as research, consulting, and clearinghouse services. (See fig. 1.1 in ch. 1 of this report.)

[10] For more information regarding these contract support agents and advertising contracts, see chapter 1.

Figure 2.1: Media Campaign Costs Associated With Paid Advertising, as of September 30, 1999



[a] Includes expenditures for activities such as advertising production and labor.

Source: ONDCP Obligation and Expenditure Report to Congress, as of September 30, 1999.

Although ONDCP used administrative contract support from other federal agencies, it remained responsible for monitoring the contractors' costs and spending for the paid advertising efforts. Monitoring included attending planning meetings with the contractors, obtaining periodic financial status reports, and reviewing and approving all Campaign expenditures. In August 1998, ONDCP hired a new staff member to oversee certain contracting and financial activities of the Campaign, particularly the paid advertising contracts. Among other duties, his responsibilities included (1) working with the contract support personnel to ensure, for example, that the contract modifications and audits were appropriate;[11] (2) working with the contractors to ensure proper billings; and (3) reviewing and approving all paid advertising expenditures (i.e., contractor invoices) for cost reasonableness, allowability, and support. Also, in August 1998, ONDCP entered into a contract with an accounting firm[12] to acquire additional financial management support. The accounting firm is to review the support for advertising invoices submitted by the contractors, such as

[11] For the phase II contract with Bates and the phase III contract with Oglivy and Mather, these duties included acting as the Contracting Officer's Representative (COR) of record. For phase I, DOD maintained COR responsibilities, but under its interagency agreement, ONDCP still approved all invoices before payment and made recommendations to the COR regarding other issues related to the Campaign task order.

[12] Cox and Associates, CPAs, P.C.

media vendor billings, and make recommendations to ONDCP regarding payment approval.[13]

For each phase of the Campaign, ONDCP's advertising contractors used a private-sector, on-line accounting and account management system to produce the invoices sent to ONDCP for the Campaign. The on-line system supports various aspects of the Campaign, including planning, purchasing, and billing, and is used as the basis for the contractors' invoices that are sent to ONDCP. According to advertising contractor officials, this accounting and account management system is generally accepted by the advertising industry and used by most large advertising firms in the United States.

In addition to the invoice review support provided by the accounting firm, in March 1999, HHS' Program Support Center contracted, on behalf of ONDCP, with the Ad Council to assist ONDCP in reviewing invoices for producing new advertisements, among other tasks. Subsequently, ONDCP adopted a review process for new advertisement production in which ONDCP must approve all invoices on the basis of recommendations for payment by the Ad Council and its subcontractor, which are to review each new advertisement production invoice for cost reasonableness, allowability, and support.

ONDCP officials are responsible for recommending the payment or nonpayment of all invoices to HHS.[14] After obtaining recommendations regarding payment from the accounting firm and/or the Ad Council, an ONDCP official is to review the completed work and, as necessary, independently review the underlying support. For example, an ONDCP official is to review all of the support provided for the contractor's labor and out-of-pocket[15] billings. The ONDCP official also reviews the invoice for cost reasonableness and allowability before recommending payment or nonpayment. Once HHS approves payment, the invoices are to be paid, and ultimately, paid advertising expenditures are to be reported to Congress as part of ONDCP's monthly cumulative financial reports.

[13] As part of its review procedures, the accounting firm also is to verify the invoice totals, check for duplicate billings on previous invoices, and verify that the dates of service coincide with the contract effective dates, among other actions.

[14] Per contractual requirements, all invoice payments are provisional until final payment is made under the contract, since payments are subject to later audit. Thus, for example, until the contract is closed, each payment is subject to possible adjustments if additional information indicates that the initial payment was incorrect.

[15] According to an ONDCP official, out-of-pocket costs include media production, tracking, and evaluation.

To further assist ONDCP in tracking and categorizing detailed Campaign expenditure information, among other data, ONDCP directed the accounting firm to establish and implement a Campaign tracking system that is based on requirements created by ONDCP. ONDCP remained involved throughout the system's development, testing, and implementation, according to ONDCP officials, to ensure that the system met ONDCP's objectives. According to ONDCP and accounting firm officials, the financial management application of the system includes data on all paid advertising expenditures to date, for all three phases of the Campaign. The system is capable of providing reports on paid advertisement expenditures by numerous spending categories, including the type of spending (e.g., media purchases, media production, and labor); type of media purchased (e.g., radio, television, newspaper, magazine, and the Internet); and geographic location of advertising placements, among others. Accounting firm officials are to use the system to assist them with their review of contractor invoices. As a result, the data in the system are based on the advertising contractors' Campaign invoices and supporting documentation (e.g., media vendor billings). At the time of our review, the system was being used to process paid advertising invoices.

ONDCP Obligated Funds in Compliance With Selected Statutory Spending Restrictions

Congress established statutory spending restrictions limiting ONDCP from obligating Campaign funds until certain conditions were met. Our review of supporting documentation and discussions with agency officials showed that these funds were obligated in accordance with selected statutory spending restrictions for fiscal years 1998 and 1999.[16]

The Treasury and General Government Appropriations Act of 1998 prohibited the obligation of Campaign funds before the ONDCP Director's submitting a Campaign strategy for approval to the Appropriations Committees and the Senate Judiciary Committee. The act further prohibited the obligation of $17 million before September 30, 1998. ONDCP financial and contract management officials stated that they monitored the obligation of Campaign funds to ensure compliance with these restrictions. In November 1997, ONDCP submitted a Campaign strategy to the Committees,[17] and by December 10, 1997, ONDCP had received approval to begin obligating Campaign funds. On the basis of the Campaign contracts

[16] We did not review documentation supporting 100 percent of the appropriations for fiscal years 1998 and 1999. For fiscal year 1998, we reviewed documentation that represented 91 percent of the appropriation available for obligation; for fiscal year 1999, we reviewed documentation that represented 94 percent of the appropriation. Also, we did not review all statutory spending restrictions (see Objectives, Scope, and Methodology section in ch. 1).

[17] Subsequently, ONDCP submitted additional information to the Committees regarding its development of certain guidelines related to this statutory provision.

and other obligating documents we reviewed, which represented 91 percent of the 1998 Campaign appropriation available for obligation,[18] the first obligation for $14 million was incurred on December 18, 1997, following ONDCP's submission to the required Committees and its subsequent receipt of approval to begin obligations. Further, OMB did not apportion $17 million of the Campaign's appropriation to ONDCP for obligation until after the end of fiscal year 1998 to ensure compliance with the statutory provision.[19]

The Treasury and General Government Appropriations Act of 1999 required that (1) no Campaign funds be obligated before ONDCP's submitting a report on the evaluation and results of phase I of the Campaign to the Appropriations Committees and (2) not more than 75 percent of the Campaign funds be obligated before submission of a report on the evaluation and results of phase II. ONDCP financial and contract management officials stated that they monitored the obligation of Campaign funds to ensure compliance with these restrictions. ONDCP submitted a phase I evaluation report to the Appropriations Committees on October 1, 1998,[20] and the phase II report on May 7, 1999. Our review of Campaign contracts and other obligating documents, representing 94 percent of the 1999 Campaign appropriation, indicated that ONDCP complied with these restrictions. On the basis of our analysis, ONDCP incurred its first Campaign obligation on October 22, 1998, and, as of May 7, 1999, had incurred obligations representing about 74 percent of its fiscal year 1999 appropriation.[21]

The Treasury and General Government Appropriations Act of 2000 required that 10 percent of Campaign funds not be available for obligation before ONDCP's submitting a corporate sponsorship plan to the Appropriations Committees.[22] As with previous statutory spending restrictions, ONDCP contract and financial officials said that they would monitor compliance with this restriction to ensure that obligations

[18] We reviewed documents representing 91 percent of the $178 million available for obligation. Although Congress appropriated $195 million for fiscal year 1998, $17 million was unavailable for obligation until September 30, 1999.

[19] Apportionment is the action by which OMB distributes amounts available for obligation in an appropriation or fund account. The amounts apportioned limit the amount of obligations that may be incurred.

[20] ONDCP submitted a final phase I evaluation report in March 1999.

[21] ONDCP's Campaign had a remaining available balance of about $24 million from its fiscal year 1998 appropriations. Thus, fiscal year 1999 obligations were initially offset by this amount.

[22] Public Law 106-58, 113 Stat. 447, 449 (1999).

occurred in accordance with the statutory requirements. ONDCP's plan to secure private sector contributions, including corporate sponsorship, is still under development. (See ch. 3 of this report for details regarding the status of ONDCP's efforts.)

Conclusions

In response to statutory requirements, since May 1998, ONDCP generally provided timely written financial status reports to Congress on cumulative Media Campaign obligations and expenditures during fiscal years 1998 and 1999. ONDCP also established processes to approve and monitor paid advertisement spending, which represented about 84 percent of the total expenditures for fiscal years 1998 and 1999 reported by ONDCP. Further, ONDCP complied with selected statutory spending restrictions limiting the obligation of fiscal years 1998 and 1999 funds until certain conditions were met.

Agency Comments and Our Evaluation

In its written comments on a draft of this report, ONDCP indicated its agreement with our findings and conclusions in this chapter and did not raise any issues or concerns. ONDCP also stated that we could have placed greater emphasis on ONDCP's ability to meet statutory requirements given the scope and complexity of the Campaign; the speed with which it was implemented; and the multitude of contracting, legal, and other issues involved.

In commenting on our findings and conclusions, ONDCP inferred that we conducted a financial audit. ONDCP added that while it retained outside administrative contract support, internal controls allowed it to monitor expenditures and control payments. We want to emphasize that we did not conduct a financial audit of the Campaign's fiscal operations or review the related internal controls. Also, we did not conduct a contract management audit or review how the internal controls were applied during the contract administration process. Rather, the scope of our work was restricted to (1) reviewing the timeliness of ONDCP's financial reporting, (2) determining how funds for paid advertising were managed and disbursed, and (3) reviewing ONDCP's compliance with selected statutory requirements regarding the obligation of funds.

ONDCP's Compliance With Statutory Program Requirements Has Been Mixed

ONDCP's success in meeting the congressionally mandated program requirements was mixed. The match program, which was developed early on to meet the congressional requirement that ONDCP supplement existing public service announcements (PSA), resulted in over 265,000 pro bono or match PSAs, valued at approximately $148 million and benefiting 45 organizations as of the time of our review.[1] However, ONDCP may not be able to fully meet the congressional direction that it obtain a pro bono match as a part of each buy from every vendor. This requirement was imposed after the development of the match program. ONDCP and the Ad Council also developed guidelines to determine the organizations that could receive the matches.

According to ONDCP, its work to supplement community anti-drug coalitions was somewhat limited during the first two phases of the Campaign due to ONDCP's need to focus on planning and executing the paid advertising Campaign. However, ONDCP and its contractors planned and/or instituted numerous initiatives to work with coalitions for phase III.

ONDCP does not yet have the congressionally required private sector contributions plan in place. It had anticipated having a plan in place by October 2000, as of the date of our review, but had fallen behind in meeting the schedule necessary to complete work by that date. ONDCP officials said that, even when a plan is in place, ONDCP may not be able to meet the congressionally mandated levels of contributions.

Finally, to meet congressional requirements, ONDCP and PDFA have (1) developed a policy and guidance prohibiting advertisements that feature political figures or partisan purposes and (2) established an advertisement review process. However, ONDCP had no internal controls requiring that the reviews be documented.

[1] Phase I data are not included because matches were used solely for the Campaign during phase I.

Match Program Developed to Meet Requirements Regarding Existing PSAs and Qualifications of Recipient Organizations

Congress directed ONDCP to develop guidelines to ensure that Campaign funds supplement and not supplant current PSAs that are donated by national and local broadcasting networks. ONDCP was also required to develop a detailed plan regarding the qualifications necessary for an organization, entity, or individual to receive this free broadcast time. To comply with these requirements, ONDCP; its advertising contractors; the Ad Council; and PDFA developed a match program during phase I of the Campaign, including criteria for receipt of the match. In general, ONDCP requires that every time the advertising contractors purchase time or space, the media vendor must provide (1) an equivalent amount of free public service time or space or (2) an equivalent in-kind contribution. The program includes not only broadcast media—national and local television, radio, and cable—but also newspapers, magazines, outdoor media (such as billboards), the Internet, in-school media, and cinema/video arcades.

Contractor Responsibilities and Type, Valuation, and Number of Matches

The ONDCP guidelines stating that advertising time or space will not be purchased without the provision of matching (i.e., free) time or space are reflected in negotiating directions that ONDCP gave its advertising contractors.[2] The contractors are to request, when negotiations for the paid time or space occur, that the media vendors match ONDCP's purchase of time or space, dollar-for-dollar with nonpaid advertisements or in-kind contributions of the same value. ONDCP's advertising contractors are also responsible for ensuring that the match time or space has been provided. The media vendor is to be paid only after the paid advertisement and its match have been broadcasted or printed.

Though individual media vendors decide how to meet the requirement, ONDCP's goal is that the majority of the matches must be in the form of equivalent time or space, known as "hard matches." For broadcast media, the match might be 30 seconds of time given for a purchase of 30 seconds of time, in a comparable time slot or location. For print media, a hard match could be a free page of advertisement for a paid page.

In addition to hard matches, media vendors may provide "soft matches," which include complementary in-kind contributions, such as programming; locally or nationally sponsored community anti-drug events; in-school programs; radio interviews; and public affairs programming. A programming soft match might be an anti-drug or alcohol message written into a television show, thus adding to the total amount of available anti-drug or alcohol messages.

[2] Bates was the contractor for phases I and II, and Zenith was a subcontractor to Bates. Ogilvy and Mather is the phase III contractor.

ONDCP requires its advertising contractors to document the value of the matches in conjunction with documentation verifying the paid time or space. Hard matches are given the same value as the purchased time or space. For example, 30 seconds provided as a match is valued the same as the paid 30 seconds. According to ONDCP and contractor officials, the valuation of soft matches was new to them and the industry and, as a result, their valuation estimates were very conservative. For example, programming (e.g., story lines and interviews) was valued using a formula that is based on the requirements for a product advertiser to officially sponsor a show. An advertiser officially sponsors a half-hour show when it purchases three 30-second advertisements. As a result, if the theme of a half-hour show was consistent with the Campaign's strategy and dominated the content of the program, the contractor was to allow credit for three 30-second advertisements. Using a less conservative approach, the contractor could have given credit for the full 30 minutes.

Because the valuation of soft matches and other nonmonetary contributions to the Campaign is new to ONDCP and its contractors, and to ensure use of the best system possible, ONDCP is in the process of securing a contractor to assist in the development of a valuation system.

Table 3.1 shows the number of hard and soft matches obtained by ONDCP contractors through December 1999, their dollar value, and the percentage dollar distribution of the hard matches compared with the soft matches.

Table 3.1: Number of Matches, Dollar Values, and Dollar Percentages, Hard and Soft, Through December 1999

	Hard matches		Soft matches		Total	Percentage	
	Number	Value	Number	Value	dollars	Hard value	Soft value
Phase I							
Bates and Zenith[a]	NA[b]	$19,000,000	NA[b]	$297,600	$19,297,600	98%	2%
Phase II							
Bates[c]	339,712	45,773,000	717	2,816,000	48,589,000	94	6
Zenith[d]	154,679	83,190,049	NA[b]	19,757,756	102,947,805	81	19
Phase III							
Ogilvy and Mather[c]	137,985	34,620,960	NA[b]	4,721,040	39,342,000	88	12
Ogilvy and Mather[d]	110,707	65,142,805	NA[b]	15,127,437	80,270,242	81	19
Total	**743,083**	**$247,726,814**	**717**	**$42,719,833**	**$290,446,647**	**85%**	**15%**

[a]All media types, both general and ethnic markets.

[b]Contractor data were not available.

[c]Newspapers, magazines, outdoor media, cinema/video arcades, in-school media, the Internet, and ethnic market.

[d]National and local general market television, radio, and cable.

Source: Contractor data.

As shown in table 3.1, the total number of hard and soft matches is understated because these data were not available from the contractor. However, the values of hard and soft matches, as determined by the contractor, are known. The number of hard matches acquired during phase I was not available because, at that time, the contractor and subcontractor did not count the individual hard matches. The value of hard matches does include phase I since the contractor and subcontractor kept financial records to ensure that they received a dollar-for-dollar match rate. The total number of soft matches acquired during phases I, II, and III was not available because the contractor and subcontractor did not count the individual soft matches during phase I, the subcontractor did not count these matches during phase II, and the contractor did not count them during phase III. However, the value of soft matches does include all phases since the contractors and subcontractor kept financial records to ensure that they received a dollar-for-dollar match rate.

Qualifications Necessary to Receive Match Time or Space

ONDCP and the Ad Council developed criteria to determine which organizations and PSAs could qualify for receipt of the national television, radio, and cable match time. The Ad Council serves as a clearinghouse at the national level. Nonprofit organizations and government agencies are to submit applications to the Ad Council on an ongoing basis for participation in the match program. Television, radio, cable, and some Internet banner advertisement matches are available for the use of qualifying organizations. To qualify, organizations and their campaigns must meet the following criteria:

- the campaign must be sponsored by a legally recognized, nonprofit organization or government agency;
- nonprofit organizations should be in compliance with guidelines of the Council of Better Business Bureaus' Philanthropic Advisory Service or those of the National Charities Information Bureau and must provide ONDCP with proof of their tax-exempt status;
- PSAs created by the media are eligible only if cosponsored by a nonprofit organization;
- messages must directly benefit the cause of a nonprofit or government agency; and
- messages with commercial benefit or commercial advertiser identification are not eligible.

Eligible messages include those that accomplish the following:

- educate and support the development of good parenting practices;
- encourage greater parental and caregiver involvement in a child's upbringing and promote effective drug prevention parenting strategies;
- foster high expectations and self-esteem for youth;
- discourage drug abuse, including underage tobacco and alcohol use; and
- emphasize the connection between drugs and crime and violence.

The messages must also be nondenominational, noncommercial, and politically nonpartisan. They cannot be designed to influence specific legislation or feature elected officials. Finally, the advertisements are to be screened to ensure acceptable creative and technical quality.

The Ad Council processes the applications and then forwards them to the Media Match Task Force for final decision. The task force consists of representatives from ONDCP, the Ad Council, PDFA, HHS, the Department of Justice, and the Department of Education. The task force reviews applications on a quarterly basis and has met seven times to make the final decisions and discuss the match program, including possible modifications to the ongoing effort.

After the task force approves the organizations and advertisements, ONDCP's advertising contractor encodes the television and radio PSAs on a master reel that is reproduced and distributed to the media vendors on a quarterly basis. National broadcast media vendors then choose from among the advertisements on the reel to satisfy their agreed-upon hard match requirement and concentrate their efforts on issues, organizations, and target audiences that best fit their public affairs priorities.

As of the time of our review, 45 organizations had received the broadcast time provided through the match program, including America's Promise, Boys Town USA, the Center for Substance Abuse Treatment, Connect for Kids, the Harvard Mentoring Project, Mothers Against Drunk Driving, and the National 4-H Council.

The American Advertising Federation (AAF) performs the clearinghouse function for local-level organizations that could use the local television, radio, and cable matches. The guidelines are the same as those used by the Ad Council. AAF reviews submissions through local review panels that usually meet quarterly; AAF's goal is to establish these panels in each of the 102 media markets. As of the time of our review, panels had been established in 74 markets. The review panels usually consist of three to six

members that are drawn from the AAF advertising clubs and federations, plus a representative of the National Association of State Alcohol and Drug Abuse Directors (NASADAD). Members of NASADAD are included because of their technical expertise in drug prevention messages. PSAs approved by the review panels are forwarded to AAF, which then forwards the PSAs to ONDCP's advertising contractor. The contractor prepares the reel to be provided to local broadcasters. AAF officials said that, as of the end of 1999, review panels had approved 117 PSAs from 8 local markets.[3]

Contractors Obtained at Least a Dollar-for-Dollar Match

According to ONDCP and its contractors, the Campaign has exceeded its goal of a dollar-for-dollar match. As of September 9, 1999, ONDCP's contractors reported an overall rate of match-to-paid value of 108 percent.

To test the accuracy of these reported data, we examined media vendor documentation, including invoices; insertion orders; vendor agreements; and brand/time schedules, in the offices of Bates and Zenith. (See pp. 30 and 31 of this report for details.) In comparing this documentation with data reported by the contractors and ONDCP, we found very few errors. Three percent of Bates' and 2 percent of Zenith's database records were in error by at least $100.[4] On the basis of our review and analysis, we can estimate with 95-percent confidence that both contractors received at least a 100-percent rate of match-to-paid value. Specifically, we estimate that Zenith procured a match rate in a range of 105 to 125 percent and that Bates procured a rate in the range of 100 to 104 percent.

Effect of the Match Program on PSA Levels Was Not Clear

By requiring ONDCP to supplement and not supplant current PSA levels, Congress expressed concern that the Campaign's advertisements should not result in the loss of PSA opportunities for other organizations. According to officials at the Ad Council, some available evidence suggests that there has been a recent increase in overall broadcast PSA levels. However, to the extent there has been an increase, there is no clear quantitative evidence to attribute it to the match program.

Neither ONDCP nor the Ad Council had baseline data on levels of all PSA activity before the Campaign. We were told that no organization tracks all PSA activity, which would include the campaigns of local, regional, and national nonprofit organizations and local and national governments. As a

[3] Before AAF's participation, PSAs approved for the national level were provided for use by local television, radio, and cable. National broadcast PSAs are still used in markets where local PSAs are not available.

[4] The 95-percent confidence interval for the estimated error rate in the Bates database was 1 to 7 percent of records; the 95-percent confidence interval for the estimated error rate in the Zenith database was from less than 1 to 8 percent.

result, ONDCP and contractor officials were unable to provide clear quantitative evidence that PSA levels had increased since the inception of the Campaign.

ONDCP expressed the intent, through its match program guidelines, that media vendors should not reduce support of Ad Council or other public service campaigns to generate the match PSA; these contributions were to be in addition to existing PSAs. We were told that at the time of negotiations, the contractors' buyers were to convey this information to each media vendor from which they made a purchase. The vendors provided assurances to the buyers that their existing support of PSAs would not change.

Overall, Ad Council officials believed that broadcasts of its PSAs had increased since the beginning of the Campaign.[5] As of the date of our review, the Ad Council managed about 30 active national public service campaigns. Ad Council officials believed these campaigns represented about 20 to 25 percent of all PSA activity. According to a Senior Vice President of the Ad Council, Ad Council PSAs increased by 21 percent from 1997 to 1998. Of this increase, about 9 percent could be attributed to advertisements used by organizations that received match time; the remaining 12 percent were Ad Council advertisements that were not a part of the match program.

Ad Council officials also provided numerous letters from organizations whose PSAs were aired through the match program. These organizations all reported increased exposure of their PSAs, and many reported an increase in calls to their hotline numbers.

Ad Council officials said that they were skeptical at first regarding the match program component of the Campaign. They were not sure if the program would work or if it would benefit organizations in need of free broadcast time. However, from their experiences to date, these officials expressed satisfaction with the program and the efforts of ONDCP and its contractors to increase the overall level of PSAs. According to these officials, ONDCP listened to their concerns and those of other organizations and designed a fair program that is intended to assist them and others with their PSA efforts. These officials were also pleased about the placement of the PSAs in desirable times that its organizations had not seen in years.

[5] The figures provided by the Ad Council reflect activity from 1997 to 1998.

Data compiled in the 1999 annual report produced by the American Association of Advertising Agencies and the Association of National Advertisers, Inc., have been cited by the Ad Council as evidence of an increase in prime-time broadcast PSAs.[6] We reviewed the annual report and found no clear pattern of an increase in broadcast PSAs across programming times, networks, or broadcast media types. In response to our questions, an Ad Council official stated that although the data provided some evidence that network PSAs increased in November 1998, the report does not provide a firm quantitative basis for determining whether an increase had occurred or, if so, whether and how much the increase was attributable to the Campaign.

Need to Attain Campaign's Reach and Frequency Goals Can Conflict With Congressional Direction Regarding the Match Program

In the fiscal year 1999 appropriation bill, Congress required that ONDCP obtain a match up front as part of the media buy from each seller of advertisement time and space. This specific language was not included in the fiscal year 2000 appropriation bill, but support for this requirement was reiterated in the conference report.[7] In a few instances, however, ONDCP and its advertising contractors have been unable to secure a match. In most of these instances, the contractors stopped the negotiations and did not make a media buy; in others, due to the advertising Campaign's need to meet its reach and frequency goals, a buy was made without the required match.[8]

According to an official at Ogilvy and Mather, ONDCP and its advertising contractors developed the Campaign's reach and frequency goals. He explained that, as in any advertising campaign, the goals are based on the belief that this specific level of reach and frequency is necessary to achieve the attitude and behavioral changes the Campaign is seeking to bring about. He also said that if these goals are not met, the Campaign will be unable to achieve its ultimate aims.

According to the contractors, time and space were purchased from 2,991 media vendors[9] during the period covering June 29, 1998, to December 31, 1999. In 15 instances, vendors did not provide a match. In 3 of these 15 instances, after a buy was made for the Campaign, the vendor

[6] '98 Television Commercial Monitoring Report, American Association of Advertising Agencies and Association of National Advertisers, Inc. (1999).

[7] H.R. Conf. Rep. No. 105-825 at 74. (1999).

[8] The overall match rate still exceeded 100 percent because some media vendors provided a match in excess of dollar-for-dollar.

[9] This number (2,991) includes overlap between vendors used by the phases I and II contractor and the phase III contractor.

reconsidered and provided a match. According to the contractors, in an additional 193 instances, vendors were unwilling or unable to provide a match; therefore, the contractors did not purchase from these vendors. From our assessment of the information provided to us, we determined that neither ONDCP nor its contractors maintained systematic records of these instances.

ONDCP and contractor officials emphasized that their goal, in keeping with ONDCP guidelines and the congressional direction, is to achieve a dollar-for-dollar match in every instance. However, they explained that, due to the need to achieve the Campaign's reach and frequency goals, they would likely continue to encounter instances in which a buy must be made without the benefit of a match. For example, the officials explained that to reach a particular segment of the target audience in a particular market, it might be necessary to purchase airtime from a small radio station that is unwilling or financially unable to provide it for free. Other vendors might be unwilling to provide free time because, due to the strong economy, they are able to sell all of their inventory. An official at Zenith emphasized that attaining the match goal is important; however, if the reach and frequency goals of the Campaign are to be met, ONDCP and its contractors need flexibility in instances in which the vendor does not provide a match.

According to an official at Bates, they were occasionally unable to get a full dollar-for-dollar match for certain media types. For example, there is a very limited inventory of "out-of-home" advertising space, such as exterior transit (panels on buses). As a result, Bates could not get a 100-percent match for this form of media. However, because the medium represented an important part of the media plan, Bates purchased the space needed to meet the Campaign's reach and frequency goals, even though the vendors provided only about a 75-percent match.

Advertising contractors raised concerns about the future viability of the match program and spoke of the following three barriers to the indefinite continuation of the program, particularly if they are required to obtain a match from every vendor:

- Media vendors have been influenced by the amount of funding available for the purchase of time and space and, as a result, are more motivated to provide the match. If ONDCP's funding for the program decreased, and smaller purchases were made, the vendors might balk at providing free inventory.
- If campaigns relating to other issues (e.g., alcohol or tobacco) begin requesting matches, the vendors might begin to be selective about their

participation because they might not be able to participate in all campaigns.

- The advertising market is in good shape now and stations are able to sell most of their inventory. If this continues, or if the stations are able to sell their entire inventory, the amount available for the match program could potentially be reduced.

Campaign's Efforts With Community Anti-Drug Coalitions Have Increased Over Time

Congress directed ONDCP to develop guidelines to ensure that Campaign funds supplement and not supplant current anti-drug community-based coalitions.[10] Guidelines were forwarded to Congress in November 1997. However, according to ONDCP, because the primary focus of the first two phases of the Campaign was on paid advertising, which is one of the six Campaign "components," less time was devoted to the other components, including work with community anti-drug coalitions.[11] Most of ONDCP's time was directed at getting the paid advertising out in the 12 pilot cities and then expanding the advertising effort nationally. According to the Director of the Campaign, the advertising focus, along with the speed with which the Campaign was rolled out, precluded a lot of work with community groups in phases I and II of the Campaign. According to ONDCP, phase III will provide the opportunity to fully develop and implement the various nonadvertising aspects of the Campaign, including partnerships with community anti-drug coalitions.

Efforts in Phases I and II Were Limited

ONDCP officials said they made several efforts during phase I to work with anti-drug coalitions or community groups. During phase I, the Community Anti-Drug Coalitions of America (CADCA) prepared a tool kit for ONDCP. This hands-on marketing guide for community coalitions introduced the Campaign and explained how the local coalitions could use the Campaign to further their own goals. A Campaign video was also prepared for the launch in the 12 pilot cities, and ONDCP met with various statewide groups to explain how the Campaign could benefit their efforts. The Campaign's director held one-on-one and conference telephone calls with community groups and coalitions; ONDCP also held national teleconferences with local elected officials. In choosing what groups or organizations to contact, ONDCP used the databases maintained by CADCA and NASADAD.

[10] ONDCP describes community anti-drug coalitions as anti-drug groups that operate in communities and span or include many and diverse institutions, such as prevention and treatment programs, police, social services, businesses, and schools.

[11] The Campaign components are as follows: paid advertising; interactive media; entertainment industry outreach; public information; partnerships (national and community organizations and coalitions); and corporate involvement, sponsorship, and participation.

In addition, in phases I and II, ONDCP provided assistance to help local coalitions capitalize on the increased visibility of drug issues within their communities. According to an ONDCP official, ONDCP provided training to the coalitions on how to get news coverage; improve public understanding of the importance of prevention efforts; and generate a range of collaborative anti-drug activities with businesses and schools and community, civic, and other local organizations. ONDCP also coordinated a Campaign launch satellite broadcast through CADCA and the National Guard.

Throughout the Campaign, ONDCP attempted to "tag" local advertisements, when appropriate, with the names and telephone numbers of community anti-drug coalitions. However, during the first two phases of the Campaign, ONDCP was not always able to tag advertisements, because the Campaign used off-the-shelf PDFA advertisements that would have required difficult and time-consuming modifications. According to an ONDCP official, the local organizations whose telephone numbers were featured in print advertisement tags provided very positive feedback regarding the response they received from callers who had seen the advertisements.

Formal ONDCP policy regarding the use of tags went into effect in December 1999. To qualify, the organizations whose telephone numbers are used must have the following:

- governmental or nonprofit status;
- a live voice or voice mail to answer calls with a capacity to return calls within 24 hours;
- E-mail and Internet access;
- the capacity to refer calls to youth and adult treatment providers and prevention programs specific to middle school youth and parents, as requested; and
- the capacity to mail, fax, or E-mail materials without cost to the caller.

According to an ONDCP official, tags are to be placed on all parent advertisements. Youth advertisements will feature tags selectively because young people have been shown to be much less likely to call in response to a tag. All local newspaper and some local billboard and local broadcast advertisements during phase III of the Campaign will be tagged.

Greater Emphasis on Community Partnerships in Phase III

ONDCP has increased its involvement with community anti-drug coalitions in phase III of the Campaign. ONDCP entered into a contract with Fleishman-Hillard, Inc., to implement four of the five nonadvertising components of phase III—interactive, public information, entertainment industry outreach, and partnerships. ONDCP's efforts with community anti-drug coalitions are a primary focus of Fleishman-Hillard's work with partnerships.

Fleishman-Hillard officials explained that there are three types of activities that ONDCP undertakes with partners: (1) using the partners' resources; (2) using the partners' communication networks to spread the Campaign's message; and (3) tailoring ONDCP programs to the organization's mission, to the extent that its mission overlaps that of the Campaign.

Fleishman-Hillard officials provided the following examples of these activities:

- using the National Education Association's school-oriented materials to further the Campaign's goals,
- using the YMCA's resources and communication structures,
- assisting the YMCA with the curriculum of its after-school programs and training its directors to work with or teach children the Campaign's message.

ONDCP and Fleishman-Hillard are now working with numerous organizations, including national organizations such as the YMCA, to strengthen anti-drug efforts at the local level. These organizations and other partnerships with community groups are displayed in table 3.2. In addition, Fleishman-Hillard has entered into discussions with many other organizations in the 102 media markets.

Table 3.2: Partnership Activities as of March 2000

Organization/Community group	Project	Description of actions being taken
AmeriCorps	Training program	Proposal in development for a "training the trainers" program to work with project leaders on substance abuse and the linking of community service projects to drug prevention.
Boys and Girls Clubs of America	In development	In discussion to explore potential partnership opportunities.
Cable in the Classroom (CiC)	Link with the National Future Farmers of America (FFA) program	The Campaign is working with CiC to share production expertise and resources with FFA members as they develop submissions for the Campaign PSA contest. ONDCP has also partnered with CiC to produce a series of four short videos for teachers demonstrating how to incorporate subjects like drug use and violence into existing curricula on other subjects.
Community Anti-Drug Coalitions of America (CADCA)	3-in-3 soccer program, leadership forum	In partnership with CADCA, the Campaign launched a series of interactive satellite programs on Campaign themes that were down-linked to about 250 CADCA sites across the country. The Campaign also participated in CADCA's National Leadership Forum in December 1999.
Community groups	Campaign Update Newsletter	The Campaign produces a stakeholder newsletter approximately four times a year that highlights programs and opportunities across the country.
Community groups	Media tool kit for community action	The Campaign developed materials for kits for national, state, and local levels to help partners carry out training and awareness-building activities to extend the Campaign's impact.
Community groups	Campaign brochure	The Campaign produces a brochure that highlights all of the components of the Campaign and its programs and opportunities.
Community groups	Broadcast E-mail	The Campaign alerts stakeholders to time-sensitive opportunities via a broadcast E-mail system. The database currently has more than 45,000 entries.
ESPN and community groups	X Games	The Campaign partnered with ESPN, through a pro bono match opportunity, to be a sponsor at the X Games in San Francisco; 11 local partner organizations were enrolled to participate.
Girl Scouts	Various	The Campaign is working with the Girl Scouts on the creation of badge and patch programs for all levels of girl scouts.
Hepatitis Foundation International and community groups	Let's Kick Hepatitis Challenge!	The Campaign hosted an exhibit and provided Campaign resource materials at this event in Atlanta in November 1999. Following the event, the Campaign also provided additional material for follow-up packets that were sent to all middle-school students in the Atlanta area.
National Association of Partners in Education	Conference presentation	The Campaign made a conference presentation, "Student Success: The Business of Partnerships," in November 1999.
National Association of State Alcohol and Drug Abuse Directors (NASADAD)	Local match task forces	The Campaign has engaged NASADAD and its affiliate, the National Prevention Network (NPN) by including a NASADAD member on each of the local match review panels; promoting the Campaign to state and local NASADAD and NPN constituents; establishing a mechanism for providing information from ONDCP to NASADAD and NPN membership; and establishing a mechanism for providing feedback from NASADAD/NPN members to ONDCP.
National Council of La Raza	In development	In discussion to explore potential partnership opportunities.

Organization/Community group	Project	Description of actions being taken
National Drug Prevention League (NDPL)	Media market mapping	The Campaign has identified capacities of community-level, drug prevention, and civic organizations in each local media market working through the 25 largest members of NDPL and their community affiliates.
National Education Association (NEA)	Education program	The Campaign is collaborating with NEA on such things as Web resources, media literacy initiatives, and the integration of a drug component for its parenting skills workshop program.
National Future Farmers of America	Youth-to-youth education	The Campaign has partnered with FFA to create a peer-to-peer PSA contest for FFA's 450,000 members. The contest was launched in October 1999. The Campaign created a Web resource area for FFA on Campaign themes.
The National Guard, Sun Microsystems, Inc., Open Voice, Forever Young Foundation, CADCA	Straight Scoop News Bureau	The October 1999 launch events included an on-line chat and live videoconference. Viewer reach was over 5 million with participation from, among others, 2,700 schools and 56 school districts.
The New York Times	Educator guide	The Campaign is working with the paper's Newspaper in Education Program and released an updated educator's tool, "Anti-Drug Education With The New York Times," in November 1999.
Prevention Through Service Alliance (PTSA)	Civic alliance	The Campaign is creating and packaging materials for and Web resources with the civic organizations of PTSA, whose 47 umbrella members include Big Brothers Big Sisters of America, National 4-H Council, Girl Scouts, 100 Black Men of America, and dozens of other community organizations. ONDCP and PDFA are also creating advertisements specifically tailored for the magazines of 37 civic, fraternal, and service organizations. A recognition program for these organizations supporting youth activities is also being developed.
Society for Human Resource Management (SHRM)	Outreach program	Discussion groups were held with SHRM members to gather information about working with the human resource community to provide anti-drug information to parents through workplace communication channels.
USA Today	Family and education program	The Campaign is working with the USA Today Family and Education program, the National Association of Student Assistance Professionals, and the National Middle School Association on the production of a print insert on Campaign themes.
Various	Freevibe	The Campaign developed this Web site for middle-school children. The Web site has extensive drug information and links. An on-line guide for teachers is also available.
YMCA of the USA	Resources, training, and after-school program	The Campaign is collaborating with the YMCA on the launch of its "City Agenda," which includes an after-school program for middle-school students. Contributions include assisting with curriculum development, training of YMCA center directors, and creating Internet and Intranet resources for members and teen staff on Campaign themes.
Youth Service America (YSA)	Community fairs, Web resource development	The Campaign is working with YSA to create 35 National Youth Service Day programs around the country highlighting volunteerism as a drug prevention intervention. Web resources are in development to take advantage of YSA's youth volunteerism opportunities across the country.

Source: Fleishman-Hillard, Inc., and ONDCP.

Fleishman-Hillard has also developed a Media Tool Kit for Community Action. The kit will be given to community anti-drug coalitions and others and will provide information about what the Campaign is and how these groups can use it in their own programs.

According to ONDCP, the Ad Council is also playing an important role with community groups during phase III. As a part of its contract with ONDCP, the Ad Council is developing and assisting in the implementation of an anti-drug coalition/drug prevention organization recruitment campaign. Through this effort, ONDCP hopes to recruit adults to join anti-drug organizations, including community coalitions. In partial fulfillment of this task, the Ad Council established an Anti-Drug Coalition Task Force, which held meetings with a broad range of coalitions to assist the Ad Council in understanding the work of the coalitions, how they recruit, and the barriers to participation in the work of these coalitions. In addition, six focus groups met to discuss why some individuals decline to become involved in anti-drug coalitions. Through these meetings, the Ad Council learned that many adults (1) do not feel qualified to join an anti-drug group, (2) are afraid of the stigma associated with being part of an anti-drug group, and/or (3) have a negative opinion of anti-drug groups.

The Ad Council concluded that an educational awareness campaign would be needed before a serious recruitment effort could be successful. In response, the Ad Council developed a two-stage approach. The first stage, to be carried out over 1 to 2 years, is to (1) focus on education and awareness to change misconceptions about anti-drug coalitions and present a positive face on anti-drug coalition activities and (2) involve a series of print and possibly, outdoor, advertisements directed toward adults. This campaign is to be launched in August 2000. The second stage of this campaign will focus on recruitment, using various advertising media.

Through the AAF and the local-level match program, ONDCP also assists community anti-drug coalitions by providing free media time to those that qualify for the match time (see pp. 46 and 47 of this report, for additional details).

ONDCP staff also attended all regional meetings in 1999 of the Centers for the Application of Prevention Technology, which is an organization that brings together coalitions at the local level. ONDCP used these meetings to bring members up to date on the Campaign and how it can be used as a tool to their benefit. ONDCP staff also made presentations at the bimonthly meetings of the National Drug Prevention League (NDPL) and

obtained information about local-level chapters. NDPL is made up of representatives from 30 groups that are involved in prevention. Through NDPL, ONDCP is to identify in each market the capacities and points of contact for prevention, civic and community organizations, and experts. This information is to be used to create a media market map that will establish a communications framework for Campaign initiatives and for responding to time-sensitive media opportunities.

ONDCP Has Not Developed a Private Sector Contributions Plan

Congress directed ONDCP to develop a detailed implementation plan for securing private sector contributions including, but not limited to, in-kind contributions. In its November 1997 submission to Congress, ONDCP stated its intention to finalize a detailed plan in January 1998. However, as of the date of our review, ONDCP had not yet developed a detailed implementation plan for securing private sector contributions and was slipping on its current schedule to produce a plan by October 2000. Nevertheless, even without a plan, as of March 2000, ONDCP reported contributions valued at an estimated $71.7 million. According to ONDCP, even when a plan is finalized, ONDCP may not be able to raise the required amounts in private sector contributions.

ONDCP Was Unable to Implement a 1998 Plan

A proposed corporate sponsorship/participation plan was developed in 1998 by Porter Novelli, which is a strategic communications planning firm under contract with ONDCP for phases I and II of the Campaign. ONDCP officials explained that this plan was not implemented for the following reasons:

- Implementation of the plan was included in the contract with Porter Novelli as an unpriced option. ONDCP wanted to exercise this option for implementation in the fall of 1998. However, it realized that when exercising an unpriced option, the contractor must be justified as a sole source. It was not possible to justify Porter Novelli as a sole source for this activity.
- The plan focused heavily on corporate sponsorship.[12] ONDCP believed that other approaches, such as direct monetary contributions, might be more

[12] Congress, in the initial Campaign legislation, required ONDCP to submit a plan to secure private sector contributions. The Porter Novelli plan defined the following three types of contributions: (1) corporate sponsorship, or rights fees paid by corporate brands in exchange for specific benefits and promotional rights around the campaign and its target audiences; (2) corporate charitable contributions, or donations of cash and/or in-kind services to the campaign; and (3) media or promotional matches, or free or discounted time or space given as part of the match program (see pp. 43 to 51, of this report, for additional detail), or the requirement that corporate sponsors dedicate a percentage of their own media and promotional vehicles to publicizing their participation in the campaign. In subsequent legislation, Congress referred to corporate sponsorship. In this discussion of private sector contributions, we refer to all types of contributions.

advantageous to the Campaign than a heavy focus on corporate sponsorship, and ONDCP wanted time to "test the market."

- The Campaign lacked a "brand," which ONDCP officials explained is a unifying idea that permeates every aspect of a media campaign and that heightens recall of campaign messages. Both ONDCP and PDFA came to believe it would be necessary to develop this unifying idea before developing a contribution plan.[13]
- ONDCP decided that to make the most effective use of a contributions plan, it would first need to have the full phase III Campaign in place because resources generated from the private-sector contributions plan could support the nonadvertising components of the Campaign, such as partnerships.
- Other demands of the Campaign made it difficult to focus on the contributions plan. The development and implementation of a media campaign was new to ONDCP. The first two phases of the Campaign were devoted primarily to planning and executing the paid advertising segment of the Campaign. ONDCP also began the nonadvertising communication activities in areas of public information, the Internet, entertainment industry collaboration, and partnerships with nongovernmental organizations.
- ONDCP staffing limitations also played a part. The few staff devoted to the Campaign had many other responsibilities important to the Campaign in the first two phases, such as working with the contractors on the paid advertising campaign.

Steps and Timetable for Development of a Contributions Plan Were Behind Schedule

ONDCP hoped to have a detailed implementation plan for securing private sector contributions in place in October 2000. Officials explained that as a first step, ONDCP would issue a request for information (RFI), using this mechanism because ONDCP has no in-house expertise regarding private sector contributions. Private industry would be asked to identify specific requirements that are necessary for formulating and executing a program to develop and apply private resources to the Campaign. The information acquired through the RFI process would be included in the statement of work section of a request for proposal (RFP) that ONDCP would issue to obtain a contractor's assistance with the development and implementation of a contributions plan. ONDCP estimated that it would take about 1 year to implement a private-sector contributions plan once a contractor is chosen.

ONDCP had planned to obtain a contractor according to the following timetable:

[13] The campaign launched its brand, "The Anti-Drug," in September 1999.

- Issue the RFI in November 1999, with the closing date for responses in January 2000.
- Issue the RFP in March 2000, after review of the RFI and meetings with industry representatives for additional input into the RFP.
- Award a contract around October 2000.

However, as of the time of our review, the process had not begun; neither the RFI nor the RFP had been issued.

ONDCP was also looking for a firm with expertise in both valuation and advertising to advise ONDCP on how to value noncash contributions, such as entertainment story lines and special events tailored to the needs of the Campaign. ONDCP planned to either issue an RFP or use a firm from the General Services Administration schedule. ONDCP did not meet its goal for completing the selection process for this contract by the end of calendar year 1999.

ONDCP Received Contributions in the Absence of a Plan

Even without a plan to secure private sector contributions, as of the time of our review, ONDCP reported the contributions listed in table 3. 3.[14] ONDCP and its contractors valued these contributions at a combined estimate of over $71.7 million.

[14] ONDCP has received both cash and various in-kind contributions but has not received corporate sponsorship to date.

Table 3.3: Private Sector Cash, In-Kind, and Other Contributions

	Contribution	
Type/Source	**Description**	**Value**
Cash		
United Parcel Service	N/A	$30,000
The Waitt Family Foundation	N/A	100,000
Subtotal		**$130,000**
In-Kind		
ABC	The creative development and production costs of six PSAs.	$1,500,000[a,b]
ABC/Disney	Free development and management of the "Freevibe" Web site.	100,000[a]
America Online, Inc.	Free development and management of a Web site for parents, the development of Web sites for teens and middle school children, and sponsorship of several Web chat sessions on drugs.	1,000,000[a]
CBS	The creative development and production costs of four PSAs.	1,200,000[a,b]
ESPN	The creative development and production costs of seven PSAs.	500,000[a,b]
Fox	The creative development and production costs of five PSAs.	1,400,000[a,b]
NBC	The creative development and production costs of seven PSAs.	1,700,000[a,b]
PDFA	Advertisements for use in the Campaign.[c]	61,800,000[a]
Univision	The creative development and production costs of two PSAs.	500,000[a,b]
WB Network	The creative development and production costs of four PSAs.	1,200,000[a,b]
Subtotal		**$70,900,000**
Other		
CADCA	Showed six national satellite downlink broadcasts to its members on media Campaign message themes.	[d]
Current Miss America	Contributed her time for personal appearances, PSAs, and Internet chat sessions.	[d]
Major League Soccer	Sponsored a "coachaton" anti-drug event, placed anti-drug information on its programs, requested that its teams do anti-drug events, and designated one of its players as a national spokesman on the drug issue.	[d]
Miss Teen USA Pageant	Designated youth anti-drug media Campaign as the pageant's official cause.	[d]
Reader's Digest, the Ad Council, and the DC Boys and Girls Club	Sponsored a youth PSA contest.	[d]
Seventeen Major League Baseball teams and 5 NFL teams	Ran PSAs during games.	[d]
Several local school districts	Sponsored a youth PSA construction media summit.	[d]
Subtotal		**over $700,000**
Total		**over $71,730,000**

[a]Valuation was determined by contractors using industry standards.

[b]Does not include the value of the time donated by celebrities.

[c]Does not include contributions from advertising firms for creative development, the full value of the waiver of celebrity actors' fees, and the full value of the waiver of music rights fees from owners of copyrights.

[d]ONDCP did not separately value these contributions; it estimated a combined value that exceeds $700,000.

Source: ONDCP.

ONDCP May Be Unable to Achieve Contributions Goals

For fiscal year 1999, Congress added the requirement that ONDCP develop a plan to secure contributions equaling 40 percent of the Campaign's appropriation for that fiscal year—60 percent in fiscal year 2000; 80 percent in fiscal year 2001; and 100 percent in fiscal year 2002. The Campaign was appropriated $195 million in its fiscal year 1998 appropriation and $185 million in both its fiscal years 1999 and 2000 appropriations. For fiscal year 2000, Congress directed ONDCP to hold back 10 percent of its appropriated funds until ONDCP submitted a corporate sponsorship plan to the Appropriations Committees (see pp. 40 and 41 of this report). In addition, the Senate Appropriations Committee specified that ONDCP should secure contributions equaling 80 percent of the Campaign's fiscal year 2000 appropriation, which was an increase of the requirement established for fiscal year 1999.

ONDCP officials told us that even when a private-sector contributions plan is developed and implemented, they do not believe they will be able to attain the highest levels of the congressionally mandated levels of contributions. ONDCP officials said they did not know at what level of congressionally mandated contributions they would run into trouble. An ONDCP official indicated that, on the basis of Porter Novelli's 1998 proposed plan and its knowledge of corporate sponsorship and what the market will generally "bear" in this area, ONDCP might be able to obtain from $20 million to $30 million a year in financial or in-kind contributions, including the value of corporate sponsorship, for a few years. ONDCP plans to learn more about market limitations through the process of developing the statement of work and awarding a contract for the implementation of a contributions plan. ONDCP then plans to brief Congress on what ONDCP might be able to accomplish in terms of total annual contributions.

Guidance and Procedures Regarding Political Figures and Partisan Political Purposes Lacked Adequate Internal Control

Congress directed ONDCP to develop guidelines to ensure that Campaign funds would not be used for partisan political purposes, and that no Campaign efforts would feature elected officials; persons seeking elected office; cabinet-level officials; or other federal officials employed pursuant to Schedule C of title 5, Code of Federal Regulations, section 213,[15] absent advance notice to the Appropriations Committees and the Senate Judiciary Committee. ONDCP and PDFA developed (1) policy and guidance addressing this requirement and (2) a review process intended, in part, to ensure that advertisements do not feature political figures or partisan content. However, neither ONDCP nor PDFA has an internal control requirement that these reviews be documented. As a result, ONDCP cannot ensure that advertisements have been reviewed for the presence of political figures and partisan content.

In its November 1997 submission to Congress, ONDCP stated that all advertisements to be used in the Campaign would be carefully reviewed to ensure that they did not feature political figures or partisan purposes. A PDFA official explained that ONDCP and PDFA subsequently inserted the following into PDFA's production guidelines:

"Please note that under no circumstances whatsoever should anyone running for public office, members of the Cabinet, elected officials, or any other political appointees to federal office be featured in a PDFA PSA. Additionally, PDFA PSA's cannot be used by anyone in public office in his or her own political advertising campaign."[16]

According to ONDCP and PDFA, advertising agencies must present their concepts to PDFA's Creative Review Committee (CRC). The CRC, which consists of creative directors from major advertising agencies, can approve, decline, or request revisions to creative work. In reviewing agencies' presentations, CRC is to follow a 29-step creative development process. The 29 steps include activities such as soliciting agencies to do the work on a pro bono basis, reviewing agency work, and notifying the agency regarding any necessary changes that must be made. None of the steps address the prohibition on political figures and partisan purposes.

Recommendations made by the CRC are to be recorded by PDFA staff and kept on a creative status report. According to PDFA, if political figures/partisan purposes were found, this would be captured in the creative status report, but the report itself does not require that these

[15] These are noncareer employees of the Senior Executive Service and, in some agencies, noncareer GS-15s.

[16] The production guidelines are instructions that detail advertisement production from start to finish and are provided to each advertising agency that develops messages for the Campaign.

reviews be documented. However, PDFA believes that the appearance of political figures/partisan purposes would be curtailed by PDFA staff. PDFA staff work closely with the advertising agency and PDFA management believe its staff would inform the agency about content that violates the production guidelines.

The final review is to be made at ONDCP. New advertisements would be presented to the Office of Legal Counsel for review. Part of that review is to ensure that the advertisements do not feature political figures or partisan purposes. However, these reviews also are not documented.

The Comptroller General's guidance on internal controls in the federal government, Standards for Internal Control in the Federal Government (GAO/AIMD-00-21.3.1), requires that all transactions and other significant events are to be clearly documented, and that the documentation is to be readily available for examination. The documentation should appear in management directives, administrative policies, or operating manuals and may be in paper or electronic form. All documentation and records should be properly managed and maintained. The documentation of transactions or other significant events should be complete and accurate and should facilitate tracing the transaction or event and related information.

Conclusions

For various reasons, ONDCP's progress and results in implementing the various program requirements related to the Campaign have been mixed. ONDCP fully complied with some requirements, is still in the process of implementing others, and may not be able to fully comply with some unless certain issues are resolved.

Although ONDCP's contractors were successful in obtaining at least a dollar-for-dollar match, they were not able to obtain a match from every vendor. To reach the Campaign's reach and frequency goals, it was sometimes necessary for contractors to purchase time or space from a vendor unwilling or financially unable to provide equivalent free time or space. Until the conflict between the congressional direction and the program goals is resolved, ONDCP may not be able to fully comply with the congressional direction or achieve its reach and frequency goals.

Although ONDCP obtained some private sector contributions, it still did not develop a detailed implementation plan to secure private sector contributions. Moreover, ONDCP indicated that, even when a plan is developed and implemented, it does not believe that it can raise annually an amount close to its annual appropriation. Instead, it believes that it might be possible to raise $20 to $30 million a year in financial or in-kind

contributions, including the value of corporate sponsorship. Therefore, until this issue of a feasible amount of private sector contributions is resolved, it appears that ONDCP may not be able to meet the congressional mandate.

ONDCP and PDFA have developed a policy and guidance to help ensure that advertisements developed for the Campaign do not feature political figures or partisan content. However, although they have established a requirement and process to review advertisements for political content, there is no internal control requirement that such reviews be documented and readily available for examination. This is important because without documentation, ONDCP cannot be certain that its policy and guidance are being followed and, thus, whether it is in full compliance with Congress' intent.

Recommendations

To improve ONDCP's compliance with the statutory program requirements, we recommend that the Director of ONDCP direct the appropriate ONDCP or contractor staff to take the following actions:

- To determine the extent to which matches do not occur because of efforts to achieve the Campaign's reach and frequency goals, maintain documentation of all purchases that do not result in a match, including why the vendor did not provide a match and why the purchase was made without a match. This information should be provided to Congress to assist in its assessment of the viability of the current congressional direction that ONDCP obtain a match from each seller of advertisement time and space given the Campaign's reach and frequency goals.
- After adequate research and consultation with experts, provide information to Congress detailing the anticipated dollar value of all private-sector, nonmatch contributions to assist Congress in its assessment of the viability of the private-sector contributions goals and the dollar value ONDCP can be expected to obtain from the private sector.
- Develop internal controls in accordance with the Comptroller General's standards to ensure that the reviews of new advertisements for political figures or partisan content are fully documented and available for examination.

Agency Comments and Our Evaluation

In its written comments on a draft of this report, ONDCP generally agreed with the findings, conclusions, and recommendations contained in this chapter. However, ONDCP stated the belief that we had given "short shrift" to its accomplishments regarding the match program. It was not our intent to do so. In fact, we recognized that ONDCP and its contractors were able to achieve a match-to-paid rate in excess of 100 percent. Our focus was on

the difficulty in obtaining a match in every instance and in developing a recommendation to address this issue. ONDCP agreed with our recommendation regarding the match program and provided, as attachment A to its written comments (see app. III), a copy of a letter addressed to Ogilvy and Mather instructing the contractor to maintain records of instances in which it is unable to obtain a match. Assuming this instruction is followed by the contractor, we believe it addresses the first part of the recommendation, that ONDCP maintain documentation of all purchases that do not result in a match. However, in instructing the contractor that this information should be made available upon request, ONDCP did not address the intent of the second part of the recommendation, that is, that ONDCP proactively provide this information to the Congress. As a result, we are retaining our recommendation.

ONDCP asked that we note that ONDCP's involvement with anti-drug coalitions was based on an incremental approach. We believe that the report's treatment of the issue of ONDCP's involvement with anti-drug coalitions already reflects such an approach to meeting the requirement to work with the coalitions. Specifically, we noted that because ONDCP's primary focus in the first two phases of the Campaign was on paid advertising, less time was devoted to the other Campaign components, including work with community anti-drug coalitions, and that ONDCP has increased its involvement with community anti-drug coalitions in phase III of the Campaign.

ONDCP asked us to amend the draft report to reflect that it has submitted a plan to secure corporate sponsorship to the Appropriations Committees.[17] ONDCP attached a copy of this plan to its comments. Our review of the document led us to conclude that it is a blueprint or strategy for ONDCP's acquiring a contractor to develop and implement a plan, rather than the implementation plan itself. In fact, as discussed on page 59, neither the RFI nor the RFP have been issued. Therefore, the requirement to submit a detailed implementation plan for securing private sector contributions has not been fulfilled.

ONDCP also notes that, in addition to nearly $72 million in unsolicited contributions, it has received another $334 million[18] in value through the

[17] The Fiscal Year 1998 Treasury and General Government Appropriations Act required ONDCP to submit to the Appropriations Committees and the Senate Judiciary Committee a detailed implementation plan for private sector contributions, including but not limited to in-kind contributions.

[18] This figure differs from that in table 3.1 because it includes data developed by Ogilvy and Mather subsequent to completion of our review.

match program. However, as ONDCP also correctly mentions, Congress has directed that the value of such match contributions not be counted as private sector contributions.

Finally, in response to our recommendation, ONDCP stated that it would formalize its existing process for reviewing advertisements for political figures or partisan content to include documenting the required legal review. Since this action has not yet been taken, we are retaining the recommendation on this matter.

ONDCP Phases I and II Campaign Evaluations Were Inconclusive; Phase III Evaluation Appears Promising

As required by law, ONDCP established a system for evaluating the impact of the National Youth Anti-Drug Media Campaign. The first two evaluation phases have been completed; the third has recently begun. The results of the phase I and II evaluations regarding the Campaign's impact on youth, teen, and parent ad awareness and drug attitudes were inconclusive because of various design, implementation, and analysis limitations. There were, however, other indications that the initial phases of the Campaign had some positive effects. These derived from unweighted awareness data, Campaign community informants, and information obtained from the Substance Abuse and Mental Health Services Administration's (SAMHSA) NCADI. Although it is too early to gauge the success of phase III in affecting drug attitudes, beliefs, and behaviors, the evaluation design appears promising, given its comprehensive scope, methodological sophistication, and use of lessons learned from previous phases.

ONDCP Has System for Evaluating the Campaign

In response to the legislative mandate discussed in chapter 1, ONDCP established a three-phase impact evaluation system for measuring the success of the Campaign. Other entities also developed research projects to help inform Campaign managers. To date, ONDCP has issued final evaluation reports to Congress on the success of phases I and II. Outcome results on phase III are scheduled to be issued every 6 months, beginning approximately in late summer 2000.

After a decade of decreasing drug use by teenagers, the Monitoring the Future (MTF) survey of 8, 10, and 12 graders showed a rising rate of drug use from 1992 to 1996 as well as a corresponding decrease in drug risk perception.[1] A major goal of The National Drug Control Strategy of 1997 was to "[e]ducate and enable America's youth to reject illegal drugs as well as alcohol and tobacco." In pursuit of that goal, one objective was to "[p]ursue a vigorous advertising and public communications program dealing with the dangers of drug, alcohol, and tobacco use by youth."

ONDCP has discussed the evaluation of the 5-year Campaign in two parts: (1) as an "impact" evaluation (subdivided into three phases) and (2) as other research projects, which have helped inform Campaign managers throughout the process.

In phase I of the impact evaluation (Jan. to June, 1998), a 6-month pilot study, ONDCP principally tested whether the infusion of a paid anti-drug Campaign made a significant difference in youth, teen, and parent ad

[1] The MTF survey is one of the nation's principal sources of drug prevalence data on school age youth. The University of Michigan has conducted the survey annually since 1975, with funding from NIDA.

awareness.[2] Twelve target sites received the paid advertisements over the 6-month period. These sites were compared with 12 comparison sites that relied on available PSAs and other community sources for their anti-drug information.

In the phase II impact evaluation (July 1998 to early 1999), which was approximately 6 months in duration, ONDCP expanded the Campaign evaluation from the 24 target and comparison sites to a national scale. Ad awareness remained the principal focus of concern in the evaluation but, as in phase I, other drug-related data also were collected.

Phase III comprises the full-scale national Campaign impact evaluation, to be conducted over a 4-year period, starting in 1999. Awareness of and exposure to media advertisements will continue to be explored, but the principal focus will shift toward evaluating the degree to which changes in drug attitudes, behaviors, and beliefs can be causally related or associated with the Campaign. These other variables were not principally considered in phases I and II since ONDCP believed that it would take another 1 to 2 years before changes in perceptions and attitudes could be detected and 2 to 3 years for drug use changes to be evident.

In addition to the impact evaluation, other research studies were developed to help inform Campaign managers. These studies included (1) the collection of local qualitative data from focus groups and key informants, under contract with SAMHSA's Center for Substance Abuse Prevention; (2) public contact and publication distribution information from NCADI; and (3) an assessment of the utility of the Campaign elements, relative to cost, developed by Ogilvy and Mather.

The principal focus of our report was to review the ONDCP impact evaluation, since it focused on the primary dependent variables—drug ad awareness, attitudes, beliefs, perceptions, and drug use change—upon which ONDCP drew its phases I and II conclusions and will draw its phase III conclusions.

An overview of ONDCP's impact evaluation design for each phase of the Campaign is presented in table 4.1.

[2] In phase I, quantitative survey data were also collected on drug attitudes, past use of drugs, perceptions of drug risk, drug information sources, and parent-child communication about drugs. Also, qualitative data were collected from focus groups and key informants (i.e., members of the community who are knowledgeable or informed about the community's drug-related problems and may play a role in policy or program decisionmaking).

Table 4.1: Methodology of the Impact Evaluations for Phases I, II, and III of the National Youth Anti-Drug Media Campaign

Methodological issue	Phase I	Phase II	Phase III
Geographic site selection	24 metropolitan areas: 12 target sites 12 comparison sites	National cross-sectional sample	National cross-sectional sample, four-site longitudinal sample, and special analytic studies
Respondent selection	Youth & teens: school survey Parents: telephone survey Focus groups, key informants, and community organizations	Youth & teens: school survey Parents: telephone survey Focus groups, key informants and community organizations	Youth & teens: household survey Parents: household survey
Actual sample size	Baseline: School survey: 18,300 Telephone survey: 4,314 Follow-up: School survey: 17,015 Telephone survey: 4,211	Baseline: School survey: 22,534 Telephone survey: 4,209 Follow-up: School survey: 23,414 Telephone survey: 4,256	Data are not yet collected
Principal analytic focus	Ad awareness	Ad awareness	Ad exposure, drug use, attitudes, and beliefs
Campaign evaluation period	January 1998 to June 1998 (total of 6 months)	July 1998 to early 1999 (total of about 6 months)	Starting in 1999 (total of 4 years)
National sponsorship agency	ONDCP	ONDCP	ONDCP/NIDA
Primary evaluation contractor	CSR	CSR	Westat

Source: Documentation provided by ONDCP and NIDA.

As requested, we addressed the following methodological and analytic questions related to the various phases of the Campaign:

- How appropriate were the evaluation designs for assessing the effectiveness of phases I, II, and III?
- How successfully were these evaluation designs implemented?
- How effective were the first two phases of the Campaign in influencing both drug ad awareness and attitude change?[3]

[3] We limited our assessment of phase III to the design stage since data collection was just beginning at the time our work was completed.

Phases I and II Respondent Sampling Designs Were Generally Appropriate, but Awareness Measure Had Limitations

The phases I and II impact evaluation sampling designs for selecting youth, teen, and parent participants in the respective local and national surveys were generally appropriate on the basis of common scientific practice. However, the ad awareness measure—the principal outcome variable of both phases I and II—did not adequately measure the overall awareness generated by the Campaign.

Respondent Sampling Designs Were Generally Appropriate

In the phases I and II impact evaluations, ONDCP sought to obtain youth (grades 4 to 6), teen (grades 7 to 12), and parent participation in the local and national surveys to study the impact of the Campaign on drug ad awareness, attitudes, and other outcome variables. The sampling designs used to select respondents from each of these three groups were generally appropriate.[4]

A multistage sampling approach was used to conduct baseline and follow-up surveys of teens and youth in each phase. The phase I design involved the selection of 12 target and 12 comparison sites,[5] followed by the random selection of schools and classrooms at the sites. The goal was to obtain completed questionnaires from 24,000 students at baseline and 24,000 at follow-up, equally divided by target and comparison sites. The phase II design called for the random selection of counties nationwide, followed by the random selection of schools and classrooms in these counties. The goal was to obtain completed questionnaires from 21,000 students at baseline and follow-up, equally divided between youth and teens. The questionnaires were to be anonymously completed by students present on the day of the survey in each phase.

The parent samples in the phases I and II telephone surveys were to be selected independently from the student samples. The parent samples were obtained by random digit dialing, a standard sampling technique used in telephone surveys of the general population. Each household contacted

[4] The term "generally appropriate" is used here to indicate that although the respondent sampling design was largely positive, our outside reviewers did cite some limitations in the sampling design (e.g., student exclusion from private schools in phase I and a reduced precision of estimates attributable to highly clustered student samples). This latter limitation can occur in surveys in which students are sampled from clusters of schools.

[5] The site selection criteria included the following characteristics: (1) geographic dispersion; (2) population size and other demographic characteristics; (3) presentation, at least in some areas, of emerging drug problems; (4) availability of community drug data; and (5) low drug PSA activity, to minimize outside drug media influences.

was to be screened to determine if it contained a parent of a child 18 years old or younger. Parents satisfying these criteria were requested to participate in the survey.

Limitations Existed in the Ad Awareness Measures

Ad awareness was the major outcome variable in the phases I and II evaluations. But the ad awareness measures established in the design stage did not capture the full extent of either local or national awareness of the Campaign. Nor did the Campaign appropriately measure teen and parent awareness.

We identified several limitations that may have had an effect on ad awareness measurement, including the following:

- Youth, teens, and parents were asked only about television advertisements in the phases I and II survey forms; radio, newspaper, magazine, and billboard media ad awareness items were not included in the survey instruments. [6]
- Teen and parent awareness responses were to be measured in a conservative manner; that is, positive teen and parent awareness responses were to be based on seeing an advertisement "often" in the past few months rather than "ever" seeing the advertisement. Had the working definition of awareness been broadened, Campaign awareness results would have increased.
- "Aided recall"[7] procedures were used to assess individuals' awareness of Campaign advertisements. Although aided recall procedures have been used in other surveys, there is a risk that respondents could have indicated awareness of a specific advertisement when, in fact, they were unfamiliar with that advertisement.[8] To counter this overreporting potential, follow-

[6] In phase I of the Campaign, advertisements for youth and teens were presented on television and radio; advertisements for parents were presented on television, radio, and newspapers. In phase II, the use of magazines and the Internet were introduced. ONDCP recognized the need to ask about other media in addition to television, yet indicated that at the time that the phases I and II surveys were approved by the Office of Management and Budget, only television advertisements were available.

[7] Aided recall procedures are used in surveys in an attempt to stimulate respondents' memories. These procedures provide the respondent with information or other memory cues to help the individual complete the task, rather than leaving the individual to his/her own devices. In the Campaign, ONDCP provided respondents with one- to four-sentence descriptions of the surveyed advertisements.

[8] Seymour Sudman and Norman M. Bradburn, Response Effects in Surveys: A Review and Synthesis. Aldine Publishing Company, Chicago, 1974, pp. 80-81. Seymour Sudman and Norman M. Bradburn, Asking Questions: A Practical Guide to Questionnaire Design. Jossey-Bass Publishers, San Francisco, 1982, pp. 36-39.

up questions could have been asked (on at least a few items) to elicit a more in-depth description of the advertisement or action sequence.[9]

- One or more false advertisements could have been provided in the survey instrument as a measure of respondent veracity.[10]

Phases I and II Implementation and Analytic Limitations Compromised the Results

We identified several limitations in ONDCP's efforts to implement and analyze the phases I and II youth, teen, and parent evaluations. These limitations related to geographic site selection, unknown parent response rates, high school nonresponse rates, and problems relating to data analysis—with implications for the quantitative accuracy, representativeness, and generalizability of the youth, teen, and parent survey results.

Geographic Site Selection Proved Problematic

The phase I survey design strategy called for obtaining a geographic sample of comparable target and comparison sites to determine whether the paid Campaign intervention made a difference in local ad awareness and other outcome variables. However, several target and comparison sites were not comparable at the implementation stage. As a result, ONDCP could not determine how much of the ad awareness differences found between these sites should be attributed to the campaign intervention versus other outside factors.

To test the effects of the paid Campaign in phase I, ONDCP sought to create comparable (or matched) target and comparison sites in an effort to minimize the effects of outside factors. If the target sites exposed to the paid media advertisements demonstrated more positive effects than matched the comparison sites on ad awareness and other outcome variables, ONDCP would have had greater assurance that at least some of these positive effects may have been due to the Campaign. ONDCP presented its matching strategy in the phase I final report. "Each site was [to be] paired with a comparison site that had similar population characteristics, to the extent possible, and was located in a relatively

[9] The underreporting of ad awareness could have also taken place, given that respondents were only provided with an one- to four-sentence description of the specific advertisements in the ONDCP survey instruments. One of ONDCP's consultants believed that the false positives generated by aided recall were "probably more than offset by underreporting," but we had no way to verify the underreporting or overreporting. In addition, one of our outside expert reviewers judged the lack of unaided recall procedures as "the biggest objection" to the survey instruments.

[10] Because false advertisements were not provided in the survey instruments, ONDCP sought after-the-fact to develop a surrogate measure of this phenomenon in response to our concern. In both phases I and II, ONDCP noted that a limited number of teen advertisements had been included in the survey instruments but ultimately not used either as PSAs or in the paid Campaign. Respondents demonstrated low awareness of these advertisements both at baseline and follow-up, thereby providing some degree of reporting veracity.

similar geographic area." However, the initial pairing of target and comparison sites did not always yield sites well matched on population characteristics and geographic area, as intended by ONDCP. For example, our outside reviewers and we noted that 9 of the 12 target sites had larger populations than their matched comparison sites. In 1 illustration, the median target site (Baltimore) had a population that was 275 percent the size of its respective comparison site (Richmond)—that is, 2,383,172 versus 865,640. The crime rate per 100,000 per year in Baltimore was more than double that of Richmond (1,335 v. 603), and the percentage of children under 18 living below the poverty level in Baltimore was more than twice that of Richmond (34 v. 14). In another illustration, Washington, D.C.'s, population was more than 4 times larger than that of Birmingham, AL, which was its comparison site (3,923,574 v. 907,810). Birmingham had a crime rate that was150 percent higher than that of Washington (1,071 v. 716), an unemployment rate that was 165 percent higher than that of Washington (6.1 v. 3.7), and a child poverty level that was 258 percent higher than that of Washington (20.4 v. 7.9). In addition, Washington is located in the South Atlantic census region, whereas Birmingham is located in the East South Central region.[11] In all, 6 target-comparison site matches demonstrated crime-rate variations that were greater than 350 per 100,000 per year. Four matches were not in the same geographic census region.[12]

Further, as previously indicated, target and comparison sites were to be matched on other design variables (i.e., areas of low drug public service activity, areas of emerging drug problems, and areas of available community drug data). However, ONDCP has not presented the data indicating the success of the matches for these variables.

ONDCP also experienced problems gaining school survey data in 4 of the 12 comparison sites chosen. Since ONDCP did not have any other comparison sites in reserve, when these four sites were dropped from the study, four comparison sites already participating in the study had to be

[11] In addition, ONDCP noted that "[i]t was very difficult to find an MSA [Metropolitan Statistical Area] with characteristics similar to those of Atlanta…." Memphis was chosen as the Atlanta match. However, there were several differences between these two sites: Memphis had about one-third the population of Atlanta (981,747 v. 2,833,511), a different racial configuration (41 percent v. 25 percent African American), a crime rate 155 percent higher than that of Atlanta (1,253 v. 807), and about twice the percentage of children under 18 living below the poverty level (26.6 v. 13.9).

[12] The following matches were not in the same geographic census region: Milwaukee (West North Central census region) with Nashville (East South Central census region); Memphis (East South Central) with Atlanta (South Atlantic); Tucson (Mountain) with Austin (West South Central); and Washington with Birmingham.

used as replacements.[13] Two of these four sites were not comparable to the target sites.

Moreover, key informants participating in the Campaign pointed out that other recent events in at least four target sites and one comparison site might have influenced drug awareness results in these sites irrespective of the Campaign.[14]

Unknown Parent Response Rates; Low School Response Rates

ONDCP reported adjusted response rates[15] for the parent surveys in the phases I and II final reports submitted to Congress. The phase I adjusted response rates were reported to be 47 percent for the baseline survey and 46 percent for the follow-up survey. The phase II adjusted response rates were reported to be 53 percent for the baseline survey and 52 percent for the follow-up survey. We questioned the accuracy of these adjusted parent response rates, given the high levels of reported initial refusals[16] and the methodology used to compute the adjusted rates.[17] We also had concerns about the generalizability of the parent data.[18] ONDCP subsequently

[13] ONDCP cited four reasons for its inability to recruit alternate sites: (1) a tight time schedule—the design and implementation of the study had to be conducted in 3 months, (2) budget limitations, (3) difficulty recruiting in additional cities and schools, and (4) insufficient notice that the four sites would refuse participation—clarification was obtained in December; baseline data collection was to be completed in January.

[14] For example, key informants in the Baltimore area indicated that the Campaign may have only "slightly" raised awareness of the drug problem in the community because "numerous" federal, state, local, and private efforts have been ongoing to address drug use and trafficking; a "concurrent" media campaign conducted by Assets for Colorado Youth "may have affected survey responses" in Denver, in addition to the recent formation of institutionalized prevention programs within government; a key informant in Atlanta attributed increased awareness of anti-drug television messages to a "major anti-drug media campaign conducted in the Atlanta area in 1997" (just before the inception of the Campaign); and site visits to San Diego and Memphis demonstrated that each of these sites had ongoing anti-drug media campaigns in place before and during the Campaign.

[15] Since there were large numbers of households that refused to participate in the parent survey screening process, ONDCP could not determine exactly how many households contacted actually had a member qualified for participation (i.e., had at least one parent with a child 18 years of age or younger). ONDCP therefore adjusted the overall survey response rates in an attempt to take parent qualification into consideration.

[16] According to ONDCP, the term "initial refusals" refers to the actual number of households refusing to participate in the parent survey screening processes of phases I and II. In phase I, ONDCP reported 14,812 initial refusals at baseline and 15,249 at follow-up; in phase II, ONDCP reported 10,966 initial refusals at baseline and 11,116 at follow-up.

[17] Because of the apparent high number of households that refused to provide information about parent status, ONDCP's estimates could have been biased.

[18] Surveys with a high level of nonresponse could be affected by nonresponse bias and other statistical problems, particularly at response rates lower than 50 percent. Office of Information and Regulatory Affairs, Office of Management and Budget (OMB), The Paperwork Reduction Act of 1995: Implementing Guidance for OMB Review of Agency Information Collection, June 2, 1999, pp. 73, 127-129.

provided revised response rate data, but we found inconsistencies in these calculations as well. Consequently, the actual parent response rates for phases I and II of the Campaign are unknown.

School response rates were low for both phases I and II. This was particularly so in phase II, in which less than one-third of the originally invited schools agreed to participate in ONDCP's youth and teen surveys. In phase II, 27 percent of the schools for youth agreed to participate at baseline and follow-up; 29 percent of the schools for teens agreed to participate at these two time periods.[19] In phase I, the aggregate school response rates in the comparison sites were 41 percent at baseline and 42 percent at follow-up.[20]

To obtain the planned quotas of completed questionnaires, ONDCP selected additional schools to replace the originally selected schools that did not participate. A total of 97 replacement schools participated in phase I; 248 replacement schools participated in phase II. ONDCP's contractor was not able to provide a response rate for the replacement schools due to the nonrandom method they used to select the replacements (i.e., due to time pressures, they enlisted the participation of several schools at the same time and selected the first one willing to participate). Because of the quota procedure used, the low original school response rates and the nonrandom method of selecting replacement schools, it is likely that participating youth and teens were not representative of their respective study populations.[21] Thus, as with results of the parent surveys, the results from the school surveys should not have been generalized beyond the respondent samples.

Analysis Problems

ONDCP weighted the parent, youth, and teen results from the phases I and II surveys using population parameters. However, since there was reason

[19] In ONDCP's request for revised survey instrument clearance from OMB, it was anticipated that at least 80 percent of the schools contacted would participate in the phase II baseline study; 90 percent of those were expected to cooperate at follow-up.

[20] ONDCP provided the following two reasons to explain their "handicap" in the school recruitment process: (1) "We were new to the field and had no record of cooperation with the schools, unlike the MTF which has been in existence for more than 25 years, and (2) there are too many surveys competing for scarce time in the classroom, including the MTF, the Youth Risk Behavior Survey, state and local surveys, and several non-drug related surveys by Federal, State, and local governments."

[21] As noted by OMB, "The statistical laws that permit inference from a sample to a population assume complete coverage, complete response, and random selection… 'quota samples' cannot produce results that can be generalized to the universe of study. Likewise, samples drawn from a substantially incomplete frame, or which suffer from significant nonresponse cannot support valid statistical inferences." Office of Information and Regulatory Affairs, OMB, The Paperwork Reduction Act of 1995: Implementing Guidance for OMB Review of Agency Information Collection, June 2, 1999, p. 73.

to believe that the samples of these respective groups may not have been representative of their respective populations (due to unknown parent response rates, high school nonresponse rate, and loss of the randomized sample) unweighted data—that is, actual data that were obtained from the respondents participating in the survey samples—should have been used.

In addition, tests were used to determine the statistical significance of these survey results. However, statistical significance testing generally requires that data be obtained from random samples. Youth and teen data collection from replacement schools was implemented in a nonrandom fashion. Therefore, use of statistical significance testing with these results is questionable. At a minimum, ONDCP should have indicated that statistical tests had been used even though the final samples were not completely random. ONDCP should also have provided reasons, on the basis of such factors as subject matter knowledge, experience, and judgment, why it believed such tests were nevertheless justified.

Some Positive Effects Were Associated With Phases I and II

The previously mentioned limitations notwithstanding, there were indications from the unweighted survey results, community informants, and information obtained from NCADI, that led us to believe the initial phases of the Campaign had some positive effects.

First, unweighted data from the impact studies of phases I and II seemed to indicate increased awareness of Campaign advertisements. Youth, teens, and parents in target sites[22] demonstrated positive gains on 25 of 26 unweighted ad awareness items during these phases of the Campaign. Unweighted drug attitudinal data for the three groups showed both small gains and losses.

Second, focus groups and Campaign community informants have reported anecdotal information that describe positive community anti-drug activities/changes taking place as a result of the Campaign.[23] These changes included the following:

[22] We considered only target sites in the phase I analysis to obviate comparison site match concerns. We also measured ad awareness in the same way that ONDCP measured this variable for youth, teens, and parents.

[23] Some of these findings were derived from the ONDCP phase I final report section on site-specific results; other findings were derived from the Pacific Institute for Research and Evaluation, ONDCP Media Campaign Surrogate Measures Project, report prepared under contract from the Center for Substance Abuse Prevention, Substance Abuse and Mental Health Services Administration, June 25, 1998. We did not verify each observation made by community informants against source documents.

- In Washington, D.C., prevention program providers cited a 30-percent increase in hotline telephone calls from individuals searching for information on substance abuse prevention and treatment.
- In Sioux City, several local television and radio stations aired the campaign advertisements as PSAs rather than as paid slots. The stations donated the money saved from the paid advertisements to community prevention programs.
- In Colorado, a $50,000 grant was allocated for conducting marijuana education.
- In Houston, advertisements were aired on Channel 1 in the Houston Independent School District.
- In San Diego, the Partnership for a Drug Free San Diego was asked to provide the police force with substance abuse prevention materials for its neighborhood policing effort.

Third, our comparison of the volume of NCADI's public contacts[24] and publications distribution over three, 6-month periods[25] showed that clearinghouse activity increased substantially during the Campaign period. For example, there was a 192-percent increase in telephone contacts and a 64-percent increase in faxes, E-mails, and mail contacts between the pre-Campaign and phase II periods. The number of hits per day on NCADI's PREVLINE Web site increased from 44,433 in the pre-Campaign period to 74,905 during phase I and 103,303 hits in phase II (an increase of 132.5 percent within a 1-year period.) In phase II, there were also distribution increases on five of seven anti-drug publications, ranging between 122 percent and 249 percent compared with the pre-Campaign period (see app. II). Although at least some of this increased activity could be due to factors other than the Campaign, NCADI data lend support to the contention that there is a positive relationship between increased Campaign awareness and heightened clearinghouse activity.[26]

[24] Public contacts comprise telephone calls, faxes, regular mail, E-mails, and Internet Web site hits.

[25] Phases I and II were compared with a pre-Campaign period: the pre-Campaign period (July 1997 to Dec. 1997), phase I (Jan. 1998 to June 1998), and phase II (July 1998 to Dec. 1998).

[26] To illustrate, a Campaign advertisement for a marijuana publication appeared in Parade Magazine. NCADI reported receiving 2,776 contacts the following day, resulting in the shipment of 5,299 copies, approximately 3 times the number of publications shipped either the week before or after the advertisement appeared. In addition, SAMHSA found that daily increases in the distribution of seven publications were associated with Campaign activities announcing the ONDCP toll-free telephone number. We did not seek to verify these data.

The Phase III Evaluation Design Appears More Promising Than Previous Phases

The phase III evaluation design appears to be more promising than previous phases in being able to provide a more comprehensive overall assessment of the Campaign's impact and effectiveness. This is because the phase III design (1) seeks to examine a more extensive set of evaluation objectives and variables, including drug use behaviors, attitudes, knowledge, and belief patterns; (2) incorporates a theoretical model of the relationship between these variables, to better understand the process through which media exposure occurs and drug use and attitudinal change take place; (3) employs a sampling design that builds upon lessons learned from phases I and II, and allows for the collection of both cross-sectional and longitudinal data; and (4) uses a more comprehensive analytical strategy for demonstrating whether there is a preponderance of evidence in support of the Campaign. Also, the continued collection of NCADI data as a supplemental measure will help to demonstrate whether public awareness of and exposure to anti-drug messages are increasing or diminishing over time. In addition, an Ogilvy and Mather study will seek to determine the impact of particular media elements, with the aim of revising the Campaign while in progress to maximize its effectiveness.

Phase III Objectives Are More Extensive Than Those for Phases I and II

According to NIDA, the phase III evaluation will comprise the following five major objectives, containing a greater number of intermediate and outcome variables than was covered in the phases I and II evaluations:

- measure changes in drug-related knowledge, attitudes, beliefs, and behavior in youth and their parents;
- assess the relationship between changes in drug-related knowledge, attitudes, beliefs, and behavior and their association with self-reported measures of media exposure, including the salience of message;
- assess the association between parents' drug-related knowledge, attitudes, beliefs, and behavior and those of their children;
- assess changes in the association between the parents' drug-related knowledge, attitudes, beliefs, and behavior and those of their children that may be related to the Campaign; and
- assess the extent to which community-based drug prevention activities change in response to the Campaign.

During phase III, the relationship between the Campaign and drug use behavioral change—the key outcome variable—will be initially explored. ONDCP officials had not examined this relationship in earlier phases of the study because they said that it would take approximately 2 to 3 years for the Campaign to have an impact on drug use change. Both phases I and II were each only about 6 months in duration.

The Phase III Sample Designs Build on Lessons Learned From Phases I and II

The ONDCP phase III evaluation of the Campaign is based primarily on two studies, the National Survey of Parents and Youth (NSPY) and the Community Longitudinal Survey of Parents and Youth (CLSPY). Both studies use household surveys—rather than school and telephone surveys—to maximize response rates. Both studies sample parents and youth from the same households to study interaction effects that may be taking place among family members. If these phase III design elements are properly implemented, ONDCP should be able to provide Congress and the public with more conclusive results regarding the impact of the Campaign than were provided in phases I and II.

The NSPY was designed as a nationally representative, cross-sectional survey of noninstitutionalized youth and parent (or caregiver) respondents, living in all 50 states and Washington, D.C. As in phases I and II, a multistage sampling approach is to be used in selecting respondents. The NSPY household survey is to be administered once every 6 months, over a period of 4 years. This time frame provides NIDA and its contractors with the opportunity to continually measure changes in the outcome variables over time. This was not feasible in phases I and II, in which there was only a single follow-up to the baseline measure.

The CLSPY was designed as a longitudinal survey to better understand the progressive and interactive dynamics taking place among youth, parents, and communities in four sites, as a result of the Campaign. The CLSPY has three principal aims: (1) to determine how knowledge, attitudes, and beliefs among younger age groups relate to subsequent drug use behaviors as teens; (2) to evaluate the impact of parent-child interactions on subsequent outcome changes; and (3) to assess the impact of the Campaign on communities and local organizations.

Participating CLSPY youth and parent respondents will be interviewed for the first time at phase III baseline, and then subsequently interviewed once a year for the next 3 years, to obtain the necessary follow-up data.

Comprehensive Analytical Strategy Planned for Determining the Impact of Phase III

NIDA and its contractor/subcontractors realized that other outside factors might be impinging on individuals simultaneously during phase III of the Campaign. The phase III evaluators succeeded in designing a comprehensive theoretical model and analytic strategy for determining the impact of the Campaign on several drug intermediate and outcome variables.

A few highlights of the types of analyses planned are illustrated below:

- To assess whether the Campaign may be having a positive impact on national drug use rates, historic trend data (from the MTF and the National Household Survey On Drug Abuse surveys) will be evaluated to determine whether drug use rates during the Campaign period have declined relative to those in the pre-Campaign period.
- To assess whether changes in parents' drug attitudes are having an influence on their children, "lagged" analyses[27] are to be conducted over the 4-year, phase III time frame to determine when, and if, child attitudinal scores change in accordance with their parents.
- To determine whether there is a concurrent or lagged relationship between attitudinal modification and drug use change, current and longer-term attitudinal data will be compared against drug use change scores.
- Special analytic studies are also to be designed to focus on the "indirect, message-specific, outcome-specific, and risk-group-specific effects of the Campaign." More complex analyses, including logistic, multivariate, structural equations, will be used to design and test various hypotheses.

Further, NCADI will continue to collect information on the volume and types of public contacts received and publications distributed through the end of calendar year 2000. As previously mentioned, the volume of public contacts are to be measured in terms of telephone calls, faxes, regular mail, E-mail contacts, and Web site hits, while publication distribution data are to cover publications of general community interest. NCADI is also continuing to collect user satisfaction data as part of its overall performance monitoring and quality assurance tasks.

In addition, as part of the phase III evaluation, Ogilvy and Mather has designed an econometric study to provide continuous, short-term feedback to Campaign officials regarding the contribution of each media element to the Campaign, relative to costs. If appropriately used, the study has the potential to help ONDCP make media adjustments on an as needed basis, thereby enhancing the potential media impact of the Campaign.

Conclusions

As required by law, ONDCP has established a system to evaluate the three phases of the Campaign. However, due to various design, implementation, and analytical concerns, the phases I and II youth, teen, and parent survey evaluation data remain inconclusive. Potential limitations regarding geographic site selection, nonresponse rates, and data representativeness and generalizability may have compromised the results. But unweighted findings from the phases I and II impact studies; input from focus groups, key informants, and community organizations; and data derived from

[27] "Lagged" analyses refers to the study of changes taking place over time, rather than concurrently.

NCADI lead us to believe that the initial phases of the Campaign had some positive effects.

The 4-year, phase III evaluation design appears to be more promising than previous phases for several reasons. A theoretically based, better-designed model has been developed. More comprehensive analytical strategies have been enumerated for demonstrating the impact of the Campaign. Various statistical procedures have been designed for analyzing both current and long-term effects. Moreover, limitations of phases I and II may be overcome in the phase III design strategy, thereby maximizing response rates and permitting the study of family drug interaction patterns. Also, NCADI plans to continue to collect data on the volume of public contacts and reports distribution, a supplemental measure of campaign awareness and exposure. In addition, Ogilvy and Mather plans to determine the importance of each media element relevant to cost—on a rapid turn-around basis—to maximize the impact of the Campaign.

Agency Comments and Our Evaluation

In its written comments on a draft of this report, ONDCP generally agreed with our findings and conclusions relating to the evaluation of the Campaign's three phases, and did not raise any issues or concerns.

However, we need to clarify ONDCP's paraphrasing of two of our findings and conclusions. First, ONDCP stated that indications from NCADI and focus groups "support that the Campaign has positive effects on changing youth attitudes toward drug use." As discussed in this chapter, we found that information from NCADI and focus groups provided indications that the Campaign may have had some positive effects on anti-drug awareness. We did not find, however, that these sources provided indications of the Campaign having positive effects specifically on youth attitudes toward drug use.

Second, ONDCP stated that our report concludes that the phase III evaluation "should yield superior data." Although we concluded that phase III appears to be more promising than previous phases because of its design and analytical strategy, we did not specifically characterize the quality of data it might yield.

Experts Consulted

We consulted with the following experts in reviewing the (1) appropriateness of the methodological, statistical, and design aspects of ONDCP's evaluations of phases I and II of the National Youth Anti-Drug Media Campaign and (2) results of these evaluations.

Elaine Cardenas, MBA
Director of Marketing
The Gallup Organization

Dr. James Derzon
Research Scientist
Hamilton Fish National Institute on School and Community Violence
The George Washington University
Rosslyn, Virginia

Dr. John Finnegan, Jr.
Associate Dean for Educational Affairs
School of Public Health
University of Minnesota
Minneapolis, Minnesota

Peter Hannan, Senior Research Fellow
Division of Epidemiology
School of Public Health
University of Minnesota
Minneapolis, Minnesota

Dr. Leslie Kish, Professor Emeritus
Department of Sociology
Survey Research Center
Institute for Social Research
University of Michigan
Ann Arbor, Michigan

Dr. Philip Palmgreen
Department of Communication
University of Kentucky
Lexington, Kentucky

Dr. John Pierce
Sam M. Walton Professor for Cancer Research
Associate Director for Cancer Prevention and Control
University of California, San Diego
La Jolla, California

Dr. Michael Slater
Departments of Journalism & Technical Communication/Psychology
Colorado State University
Fort Collins, Colorado

Dr. Roger Tourangeau
Senior Advisor
The Gallup Organization

Dr. Stephen Weber
Senior Vice President
Market Facts
McLean, Virginia

NCADI Public Contacts and Publication Distribution

We compared changes in the volume of NCADI's public contacts and publications distribution over three, 6-month periods to determine whether clearinghouse activity increased during the local and national phases of the Campaign. These periods and their time frames were as follows: (1) the pre-Campaign period (July 1997 to Dec. 1997), (2) phase I (Jan. 1998 to June 1998), and (3) phase II (July 1998 to Dec. 1998).

NCADI's public contacts included telephone calls, faxes, E-mails, regular mail, and Web site hits (see table II.1). Publication distribution was based on a review of seven anti-drug publications that were directed toward youth, teens, and their parents (see table II.2).

Table II.1: NCADI Public Contacts Pre-Campaign and Phases I and II (Percentage Change From Pre-Campaign Period)

Campaign evaluation period	Total telephone contacts	Total FAX/E-mail/ mail contacts	Average PREVLINE Web site hits/day
Pre-Campaign (July 1997 - Dec. 1997)	63,765	17,625	44,433
Phase I (Jan. 1998 – June 1998)	70,337 (+10.3%)	21,482 (+21.9%)	74,905 (+68.6%)
Phase II (July 1998 - Dec. 1998	186,251 (+192.1%)	28,929 (+64.1%)	103,303 (+132.5%)

Source: SAMHSA's National Clearinghouse for Alcohol and Drug Information. Weekly Reports on Impact of Office of National Drug Control Policy Youth Anti-Drug Media Campaign on NCADI Operations, 1999; and unpublished Web site documentation.

Table II.1 indicates that the volume of public contacts with the clearinghouse increased during both phases I and II of the Campaign. The greater increases took place during phase II, as would be expected, given that the scope of the Campaign had been enhanced from a local to a national effort.

Regarding telephone contacts, there was a 10.3-percent increase at phase I and a 192.1-percent increase at phase II, compared with the 6-month pre-Campaign period. Regarding total fax/E-mail/mail contacts, there was a 21.9-percent increase at phase I and a 64.1-percent increase at phase II, compared with the same pre-Campaign period. On the PREVLINE Web site (a service of SAMHSA's Center for Substance Abuse Prevention, which is operated through NCADI), there was a 68.6-percent increase at phase I and a 132.5-percent increase at phase II.

Table II.2: NCADI Publication Distribution Pre-Campaign and Phases I and II

	Campaign period and distribution (percentage change from pre-Campaign period)		
Publication	**Pre-Campaign (July 1997 to Dec. 1997)**	**Phase I (Jan. 1998 to June 1998)**	**Phase II (July 1998 to Dec. 1998)**
Keeping Youth Drug Free: A Guide for Parents, Grandparents, Elders, Mentors and Other Caregivers	258,739	269,140 (+4.0%)	574,035 (+121.9%)
Tips for Teens About Inhalants	170,507	335,895 (+97.0%)	482,445 (+182.9%)
Marijuana, Facts Parents Need to Know	52,028	120,978 (+132.5%)	161,424 (+210.3%)
Marijuana, Facts for Teens	Not available	112,058	99,383
Inhalant Abuse: Its Dangers Are Nothing to Sniff At (NIDA Research Report Series)	20,397	15,905 (-22.0%)	17,616 (-13.6%)
Marijuana, Facts for Teens (Spanish version)	11,177	18,217 (+63.0%)	26,443 (+136.6%)
Marijuana, Facts Parents Need to Know (Spanish version)	7,231	18,039 (+149.5%)	25,212 (+248.7%)

Source: Unpublished documentation submitted by SAMHSA to GAO.

Table II.2 demonstrates publication distribution gains during the Campaign period as well. Five of the seven publications showed increased distributions at phase I relative to the pre-Campaign period and even greater gains at the phase II stage of the Campaign.

In one instance—that is, regarding a publication entitled Marijuana, Facts for Teens—percentage change distribution results could not be calculated because the publication was not available in the pre-Campaign period.

In the single instance in which a distribution decrease was noted during the Campaign period, relative to the pre-Campaign time frame, SAMHSA indicated that this was due to a decreased inventory of the publication entitled Inhalant Abuse: Its Dangers Are Nothing to Sniff At.

During phase I, the median publication distribution increase, compared with the pre-Campaign period, was 80 percent. During phase II, the median publication distribution increase was 159.8 percent. For the 6 publications, for which there are data for all 3 time periods, 520,079 were distributed in the pre-Campaign period; 778,174 in phase I; and 1,287,175 in phase II.

Comments From the Office of National Drug Control Policy

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF NATIONAL DRUG CONTROL POLICY
Washington, D.C. 20503

July 3, 2000

Richard M. Stana
Associate Director
Administration of Justice Issues
Government Accounting Office
Washington, D.C. 20548

Dear Mr. Stana,

We have reviewed the draft report on the Youth Anti-Drug Media Campaign (Campaign) prepared by the Government Accounting Office (GAO). We appreciate the explanatory tone of the report, which helps to explain a rather complicated program. We find the report balanced, with fair assessments and recommendations. This memo serves merely to bring to your attention a few clarifications that would strengthen the report and more accurately reflect the current reality of the Campaign.

1. GAO Finds the Campaign Compliant with Fiscal Laws and Regulations

Now on p. 34.

Now on p. 36.
Now on p. 39.

We were pleased to learn that financial audits showed ONDCP compliant with statutory requirements for Campaign funds and programs (p. 32). Although ONDCP retained outside administrative contract support, internal controls allowed ONDCP to monitor expenditures and control payments (p. 34). ONDCP also obligated funds in compliance with selected statutory spending restrictions (p. 37). As noted in the report, delays in financial reporting have resulted from delays in closing out one fiscal year and opening another. This year's report is delayed due to upgrading of the EOP financial accounting system and ONDCP's plans to modify the report format to make it more informative and user-friendly. Given the scope and complexity of the campaign, the speed in which it was implemented, and the multitude of contracting, legal and other issues that had to be accommodated, we believe the report could have placed greater emphasis on our ability to attain this compliance.

2. Program Requirements Satisfied More than Reflected in Report

Now on pp. 43-51.

Program Requirements for the Campaign were generally met. The primary issue addressed is the pro bono match (pp. 41-45). Correctly, the report notes that

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statutory and industry restrictions and advertising business practice resulted in ONDCP being unable to obtain a match for each and every ad it placed. Sometimes ONDCP bought ads with no matches, or matches less than 100 percent. As noted, however, such situations were rare (12 vendors out of a total of 2,991 vendors representing 265,000 buys.) The report seems to give short shrift to the fact that ONDCP obtained matches with 99.5 percent of its vendors and the fact that the overall value of pro bono matches still exceeded 100 percent of the Campaign's ad expenditures. Not only is this accomplishment extraordinary in the advertising industry, ONDCP was still able to meet the Campaign's reach and frequency goals.

We agree with the need to keep records relevant to the ad purchases that are not accompanied by 100% matches. Accordingly, we have instructed our contractors to keep such records, modeled on the recommendation given in the report. A copy of this direction is at Attachment A.

Now on p. 51.

The report also accurately notes that ONDCP's work with anti-drug coalitions was minimal during Phase I (p. 49). The report reflects this was due to the Campaign's need to sufficiently focus on media buys and creative production. We sense that this language could be interpreted as implying that this requirement was not met. We request you note that ONDCP involvement with anti-drug coalitions was, necessarily, an incremental approach. Phase I of the campaign was primarily a test of advertising at the local level. An the advice of marketing professionals, we purposely did not attempt to develop the community/partnership component of the campaign or other components until we could be assured that the key component of the campaign – creation and dissemination of advertising messages - was effective. Nonetheless, the requirement to work with coalitions was met, with participation "ramping up" through Phases I and II and becoming fully operational during Phase III.

Now on pp. 57-61.

The draft report notes a 10% holdback of ONDCP's FY'00 appropriation until ONDCP submits a corporate sponsorship/participation plan to the appropriations committees (pp. 55-60). This plan was transmitted by the Director to the chairmen of our Appropriation Committees on June 16, 2000. The report should reflect the completion of this requirement. A copy of this plan is at Attachment B. Further, the report is critical of ONDCP for not developing a private sector participation plan earlier. While the report does note that more than $71 million mostly in-kind contributions have been received from Corporate America, it omits entirely the fact that another $334 million has also been contributed from corporations via the match program. In ONDCP's FY 1999

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appropriation, Congress directed that corporate contributions to the campaign that were a result of the pro bono match process not be "counted" toward meeting the Congressional mandate to generate private sector involvement. Nevertheless, the fact remains that the campaign has generated more than $400 million from the private sector since its inception.

Now on pp. 62-63.

The draft report also notes the informality of ONDCP's internal ad review process, though it did not cite such informality as the cause for any non-compliant ad (p. 61-62). Although each ad is reviewed by ONDCP's Office of Legal Counsel at the time of the ONDCP Director's review and in accordance to a well defined creative development process, ONDCP will formalize this internal control process to document required legal review.

3. Performance Measures Improved

Now on pp. 67-78.

Now on p. 76.

Efficacy of Phases I and II remains inconclusive, due to various evaluation, survey design, and implementation limitations (pp. 64-74). However, indications from SAMHSA, NCADI, and focus groups support that the Campaign has positive effects on changing youth attitudes toward drug use (p. 73). ONDCP capitalized on the lessons learned during Phases I and II. The Phase III evaluation was altered significantly to avoid similar shortfalls in its efficacy. Additionally, Ogilvy and Mather's implementation will assess the impact of each media element relevant to cost. NCADI will continue to collect data on public contacts and publication distribution as supplemental measures of ad awareness and exposure through the end of CY '00. The report concludes, and we agree, that the Phase III evaluation should yield superior data.

4. Conclusion

ONDCP is in the singular position of implementing this unique and historic campaign in an environment where it has to navigate within the limitations, cultures and sometimes conflicting goals of the government, business and public service sectors. This often poses enormous challenges. While we must deliver our advertising messages to youth and parents at a level that meets our goals, we must do so while obtaining an unprecedented 100% dollar for dollar match from media outlets during the richest advertising climate in the nation's history. We must evaluate our campaign at a cost that is at least 500% more than what the private sector typically spends evaluating their campaigns, due to the high level of academic rigor required to substantiate taxpayer expenditures. We are required to develop our ads only through a lengthy pro bono process. If the report would give

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greater recognition to these factors, which are out of the control of ONDCP, it would give readers a much more accurate understanding and appreciation of what we believe are the very significant successes of this campaign.

At the same time, we have been under considerable pressure from Congress to move rapidly to implement the campaign, report early and often on its impact, institute a massive multi-level evaluation, and respond to numerous Congressional inquiries, including six hearings.

Finally, the report could also be strengthened if it were updated to reflect the campaign's current processes and procedures, which satisfy recommendations made in the Executive Summary.

We would be happy to discuss any of these points with you and to work together to assure the report accurately reflects our current performance.

Sincerely,

Janet L. Crist
Chief of Staff

We did not reproduce attachment B.

Attachments

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06/30/00 FRI 08:04 FAX 410 451 5666 002

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF NATIONAL DRUG CONTROL POLICY
Washington, D.C. 20503

June 29, 2000

Ogilvy & Mather
Shona Seifert, Project Director
309 West 49th Street
New York, NY 10019

SUBJECT: Record Keeping of Pro Bono Matches

Reference the congressionally mandated requirement to obtain an equivalent value of time and space, or an equivalent in-kind contribution, pro bono, for the PSAs of qualifiying organizations when purchasing advertising time or space, you are hereby directed, effective immediately, to maintain detailed records of all purchases that do not result in a complete match from every vendor. Further, Ogilvy shall determine and document the extent to which matches do not occur because of efforts to achieve the Campaign's reach and frequency goals, or for other rationale, including why that particular vendor did not provide a match, whether partial or in whole, and why the purchase was made without a match. These systematic records must be kept current at all times and shall be made available upon request.

As always, I'm available should you have any questions or need further explanation.

Richard Pleffner
Project Officer
National Youth Anti-Drug Media Campaign

GAO Contacts and Staff Acknowledgments

GAO Contacts

Richard L. Stana (202) 512-8816
Daniel Harris (202) 512-8720

Acknowledgments

In addition to the persons named above, the following persons made key contributions to this report: Doris Page, Jared Hermalin, Amy Lyon, Wendy Ahmed, David Alexander, Louise DiBenedetto, Nancy Finley, Michael Little, Sidney H. Schwartz, Rebecca Shea, and Keith Wandtke.

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