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DRUG MISUSE

Agencies Have Not Fully Identified How Grants That Can Support Drug Prevention Education Programs Contribute to National Goals

Accessible Version

GAO Highlights

Highlights of [GAO-21-96](#), a report to the Congress

Why GAO Did This Study

Most people who develop a substance use disorder begin using substances as adolescents. To reach adolescents, drug prevention programs are frequently provided in schools. Education, HHS, and ONDCP manage most federal programs that support school-based drug prevention activities.

This report (1) describes how Education, HHS, and ONDCP support drug prevention activities in schools, and monitor those efforts and (2) examines the extent to which these agencies identify how their prevention activities support the National Drug Control Strategy.

GAO reviewed agency documentation, the 2019 and 2020 National Drug Control Strategy documents which ONDCP identified as being most relevant to our review including the fiscal year 2019 drug control budget, ONDCP guidance, relevant federal laws, and GAO's prior work on attributes of successful performance measures that can help achieve agency goals. GAO also interviewed federal and state officials.

What GAO Recommends

GAO is making four recommendations, including that Education, HHS, and ONDCP clarify how grants that can include drug prevention education programs support related goals of the National Drug Control Strategy. HHS and ONCP agreed with the recommendation and Education partially concurred, saying it would explore collecting and reporting related performance data.

View [GAO-21-96](#). For more information, contact Jacqueline M. Nowicki at (617) 788-0580 or nowickij@gao.gov.

DRUG MISUSE

Agencies Have Not Fully Identified How Grants That Can Support Drug Prevention Education Programs Contribute to National Goals

What GAO Found

The Department of Education (Education), the Department of Health and Human Services (HHS), and the Office of National Drug Control Policy (ONDCP) manage six key federal grant programs that can support drug prevention activities in schools. The flexibility of these grants supports a variety of drug prevention education programs. The agencies generally monitor grantees' compliance with grant requirements through periodic reporting.



Source: GAO. | GAO-21-96

The aim of the National Drug Control Strategy (Strategy) is to reduce drug misuse, but HHS, and ONDCP have not fully defined how several key grant programs support the Strategy. ONDCP's guidance directs agencies to report, for each grant program, performance measures that relate to the Strategy's goals. However, some performance measures for several programs did not relate to drug prevention, did not link directly to the Strategy's prevention goals, or were not reported at all. For example:

- A \$372 million set-aside for HHS's Substance Abuse Prevention and Treatment Block Grant program must be used on drug prevention, but HHS did not link the program's performance measures to the Strategy's prevention education goal.
- ONDCP did not report on any performance measures in the Strategy or document how its \$100 million Drug-Free Communities Support program contributes to achieving specific goals in the Strategy.

GAO also found that the approximately \$10 million grants to states component of Education's School Climate Transformation Grant program could more fully provide performance information related to the Strategy's prevention education goal.

Fully understanding these programs' contributions to the goals of the National Drug Control Strategy could help Congress and the public better understand and assess how the nation's significant investments in drug prevention education programs help address the drug crisis.

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Abbreviations

D.A.R.E.	Drug Abuse Resistance Education
DFC	Drug-Free Communities Support
Education	Department of Education
HHS	Department of Health and Human Services
NIDA	National Institute on Drug Abuse
ONDCP	Office of National Drug Control Policy
SABG	Substance Abuse Prevention and Treatment Block Grant
SAMHSA	Substance Abuse and Mental Health Services Administration
School Climate	School Climate Transformation Grant
School Districts	Local Educational Agencies
SSAE	Student Support and Academic Enrichment Grant
States	State Educational Agencies
State Opioid Response	State Opioid Response Grants
State Targeted Response	State Targeted Response to the Opioid Crisis Grant

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November 18, 2020

Report to the Congress

Drug misuse—the use of illicit drugs and the misuse of prescription drugs—has been a long-standing and persistent problem in the United States and significantly affects adolescents.¹ GAO will designate the federal government’s efforts to address the drug crisis as high-risk in early 2021.² According to the National Survey on Drug Use and Health, an estimated 2 million adolescents aged 12 to 17 in 2019 used illicit drugs in the past month, representing about 9 percent of all adolescents in the United States. According to a 2016 report issued by the Surgeon General, drug misuse can be especially harmful to adolescent brains because they are still undergoing significant development. In addition, research cited by the Surgeon General indicates that most people with a substance use disorder began using substances as an adolescent and developed their disorder in young adulthood.

According to the Office of National Drug Control Policy (ONDCP), the most effective way to mitigate the societal costs of illicit drug use is through prevention activities. Drug prevention programs and activities are designed to prevent the early use of substances and, when there is use, stop the progression to a substance use disorder. To reach adolescents, prevention programs are frequently provided in schools.

ONDCP is responsible for evaluating the effectiveness of national drug control policy across the federal government and developing the National

¹For the purposes of this report, we use the term “drug misuse” to describe both the use of illicit drugs and the non-medical use of prescription drugs like opioids. Other studies may use different terms (e.g., “drug abuse,” “drug dependence,” “substance use”, or “substance abuse”).

²In March 2020, we reported on (1) trends in drug misuse in the United States, (2) costs and other effects of drug misuse on society and the economy, and (3) challenges the nation faces in addressing the long-standing drug crisis. In that report, we noted that based on our findings from our body of work related to drug misuse, we have determined that the issue should be added to our High Risk List. See GAO, *Drug Misuse: Sustained National Efforts Are Necessary for Prevention, Response, and Recovery*, [GAO-20-474](#) (Washington, D.C.: Mar. 26, 2020).

Drug Control Strategy every two years.³ The most recent one was released in February 2020. Among other things, the National Drug Control Strategy is to set forth a comprehensive plan to reduce illicit drug use and its consequences by limiting the availability of and demand for illegal drugs and promoting prevention, early intervention, treatment, and recovery. The Strategy highlights the importance of prevention activities through education and emphasizes increasing the quantity and quality of drug prevention programs in schools. Our past work has highlighted ways in which the Strategy could be more comprehensive. In 2017 and 2018, ONDCP did not produce a Strategy, and the 2019 Strategy did not include information for all the statutorily-required components. In December 2019, we recommended that ONDCP develop and document key planning elements to help ONDCP structure its ongoing efforts and to better position the agency to meet these requirements for future iterations of the Strategy.

The Department of Education (Education), Department of Health and Human Services (HHS), and ONDCP manage the majority of federal programs that can fund drug prevention activities in schools to complement the efforts of states and local educational agencies (school districts).⁴ In addition, Education, HHS, and ONDCP must identify how their activities support the National Drug Control Strategy and report related performance information.

We prepared this report under the authority of the Comptroller General to assist Congress with its oversight responsibilities. This report (1) describes how Education, HHS, and ONDCP support drug prevention activities in schools, and how they monitor these efforts; and (2) examines the extent to which these agencies identify how their prevention activities support the National Drug Control Strategy.

To describe how Education, HHS, and ONDCP support drug prevention activities in schools and how they monitor these efforts, we reviewed key

³21 U.S.C. § 1705(a). The Director of ONDCP is required to release a statement of drug control priorities in the calendar year of a presidential inauguration, no later than April 1. The President is required to submit the National Drug Control Strategy to Congress no later than the first Monday in February following the year in which the President's term commences, and every two years thereafter.

⁴GAO, *Adolescent and Young Adult Substance Use: Federal Grants for Prevention, Treatment, and Recovery Services and for Research*, [GAO-18-606](#) (Washington, D.C.: Sep. 4, 2018).

elements of six federal grant programs that were included in the fiscal year 2019 federal drug control budget or identified by agency officials as supporting such activities. The six programs are:

- HHS: Substance Abuse Prevention and Treatment Block Grant (SABG)
- HHS: State Targeted Response to the Opioid Crisis Grant (State Targeted Response)
- HHS: State Opioid Response Grants (State Opioid Response)⁵
- Education: School Climate Transformation Grant (School Climate)⁶
- Education: Student Support and Academic Enrichment Grant (SSAE)
- ONDCP: Drug-Free Communities Support (DFC)

We also examined fiscal year 2019 budget information submitted as part of the President's budget request, which was the most recent completed year for which historical data were available. We found the data to be sufficiently reliable for the purposes of reporting selected budget information because data included in the President's budget request are used for budget decisions. We interviewed officials and reviewed documentation from organizations in the states of Washington and Michigan, including state educational agencies (states), school districts, and a county health department, to obtain their perspectives. We selected these states because they had reportedly higher rates of illicit drug use among adolescents, received funding from federal grants that may be used to support drug prevention activities in schools, and provided geographic diversity.⁷ Our interviews provide insight into how states, school districts, and schools use federal funds to support drug prevention activities, and are not generalizable.

To examine the extent to which Education, HHS, and ONDCP identify how their prevention activities support the National Drug Control Strategy,

⁵According to HHS's Office of Inspector General, the State Targeted Response to the Opioid Crisis Grant program was not funded during fiscal year 2019. Instead, funding was provided through a new effort—the State Opioid Response Grants program.

⁶The School Climate program includes grants to state educational agencies and grants to local educational agencies. The School Climate program is included under Education's School Safety National Activities.

⁷Data regarding rates of illicit drug use were available through state prevalence estimates included in the 2016-2017 National Survey on Drug Use and Health.

we interviewed key officials from these agencies and reviewed the most recent two Strategies, as well as four associated companion documents which ONDCP identified as being most relevant to our review: (1) the Fiscal Year 2019 Accounting of Drug Control Funds and Performance Summary, (2) the National Drug Control Strategy Fiscal Year 2021 Budget and Performance Summary, (3) the 2020 National Drug Control Strategy Performance Reporting System, and (4) the National Drug Control Assessment issued in February 2020. For the purposes of our report, we refer to these documents collectively as the National Drug Control Strategy or the Strategy. These documents include the most recent information reported by Education, HHS, and ONDCP regarding how their prevention activities support the Strategy. We used this information to determine if agencies had identified performance measures to assess their contributions to achieving each goal and objective of the Strategy, as required by ONDCP's guidance issued in October 2019.⁸

In addition, we reviewed agency performance measures identified in the Strategy for the grant programs we selected and compared them with selected leading practices for performance measurement identified in past GAO work. We assessed the agencies' performance measures against two selected key attributes for successful performance measures that we determined were particularly relevant to assessing how well National Drug Control Program agencies measure their contributions to the Strategy—core program activities and linkage to the overall goals and mission.⁹ We used this information to review the extent to which the performance measures identified for the grant programs we selected covered the core activities each agency is expected to perform related to prevention and linked to the long-term goals and objectives included in the National Drug Control Strategy. Finally, we reviewed relevant federal laws and regulations.

We conducted this performance audit from August 2019 to November 2020 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe

⁸Office of National Drug Control Policy, *Circular: Budget Formulation* (Washington, D.C.: Oct. 22, 2019).

⁹GAO, *Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures*, [GAO-03-143](#) (Washington, D.C.: Nov. 22, 2002).

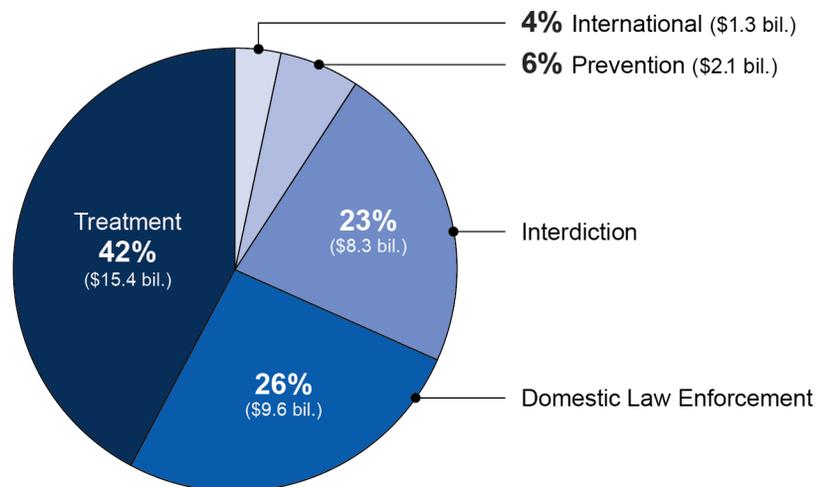
that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Federal Drug Control Budget

Ongoing drug control efforts seek to address the drug crisis through programs that serve populations affected by drug misuse through education and prevention, addiction treatment, domestic law enforcement, drug interdiction, and international activities to reduce drug availability. These efforts involve federal, state, local, and tribal governments, as well as community groups and the private sector. The federal drug control budget for fiscal year 2019 was more than \$36 billion, which was spread across more than a dozen federal agencies. Of this, about \$2 billion (6 percent) was designated to support the prevention function of the federal drug control budget, also referred to as prevention activities (see fig. 1). Funding for the prevention function as a percentage of the federal drug control budget has remained relatively constant at approximately 6 percent since fiscal year 2017.

Figure 1: Federal Drug Control Budget Funding by Function, Fiscal Year 2019



Source: GAO analysis of National Drug Control Strategy Fiscal Year 2021 Budget and Performance Summary. | GAO-21-96

ONDCP is responsible for working with more than a dozen agencies—known as National Drug Control Program agencies—to develop and

implement U.S. drug control policy across the federal government, including efforts that support prevention activities in schools (see fig. 2).¹⁰

Figure 2: Examples of National Drug Control Program Agencies



Source: GAO analysis of 2020 National Drug Control Strategy. | GAO-21-96

The National Drug Control Program agencies have important roles and responsibilities in reducing drug misuse and mitigating its effects. Education, HHS, and ONDCP manage six key grant programs—collectively funded at \$3.2 billion in fiscal year 2019—that may support prevention activities in schools (see table 1). Figure 3 summarizes total funding and grantees for the five programs that were funded during fiscal

¹⁰See 21 U.S.C. § 1702(a). Under 21 U.S.C. § 1701(11), “the term ‘National Drug Control Program agency’ means any agency (or bureau, office, independent agency, board, division, commission, subdivision, unit, or other component thereof) that is responsible for implementing any aspect of the National Drug Control Strategy, including any agency that receives Federal funds to implement any aspect of the National Drug Control Strategy, but does not include any agency that receives funds for drug control activity solely under the National Intelligence Program or the Joint Military Intelligence Program.”

year 2019.¹¹ Grant programs are one way the federal government addresses national priorities by leveraging nonfederal parties, including state and local governments, educational institutions, and nonprofit organizations.¹² The six programs we examined are a mix of discretionary, formula, and block grants.

- Discretionary grants are generally awarded on a competitive basis for specified projects that meet eligibility and program requirements.
- Formula grants are noncompetitive awards based on a predetermined formula, typically established in statute, and are provided to eligible applicants, such as states, that meet specified criteria outlined by statute or regulation.
- Block grants, a type of formula grant, typically address a national purpose but give states or local grantees the flexibility to adapt funded activities to fit the state or local context.

¹¹The State Targeted Response to the Opioid Crisis Grant program was not funded during fiscal year 2019.

¹²For more information on grant programs, see GAO, *Balancing Flexibility and Accountability: Grant Program Design in Education and Other Areas*, GAO/T-GGD/HEHS-98-94 (Washington, D.C.: Feb. 11, 1998); *Managing for Results: Analytic Challenges in Measuring Performance*, GAO/HEHS/GGD-97-138 (Washington, D.C.: May 30, 1997); and *Federal Grants: Design Improvements Could Help Federal Resources Go Further*, GAO-AIMD-97-7 (Washington, D.C.: Dec. 18, 1996).

Appendix I: Comments from the Department of Education

Table 1: Information on Selected Federal Grant Programs That May Support Drug Prevention Activities in Schools

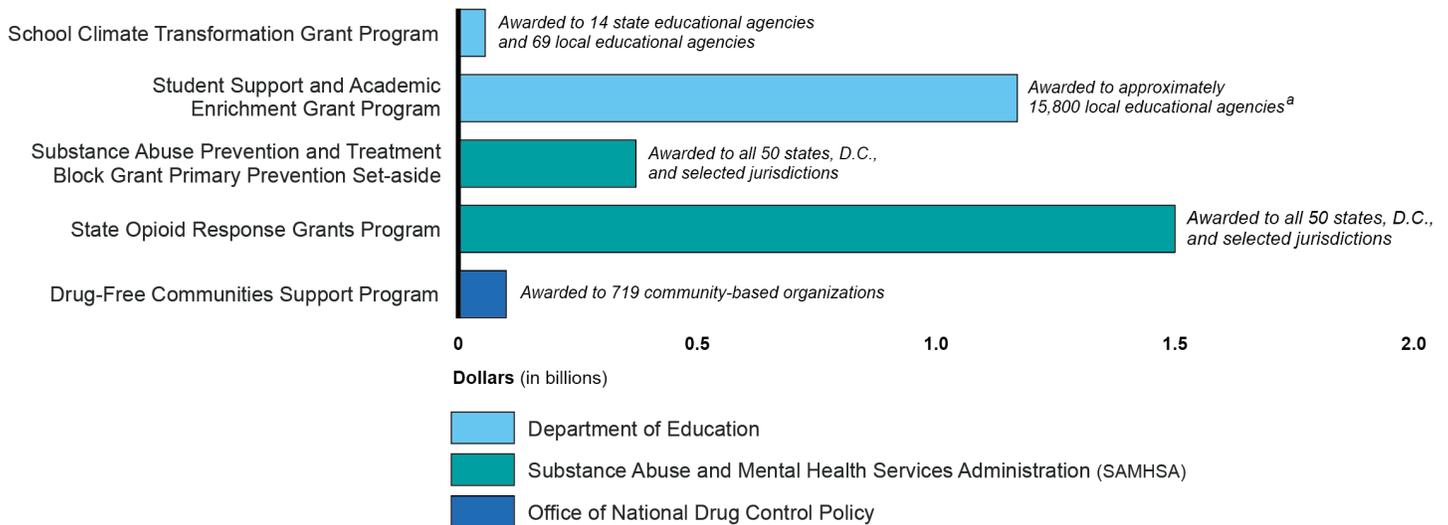
Agency	Grant program	Type of Grant	Purpose
Department of Education	School Climate Transformation Grant Program	Discretionary	Awarded to state educational agencies and school districts to help improve school climate and behavioral outcomes for all students including through drug prevention activities
Department of Education	Student Support and Academic Enrichment Grant Program	Formula	Awarded to state educational agencies to help improve student achievement across three content areas including student safety and health, which may include allowable activities such as drug prevention programs ^a
Department of Health and Human Services (HHS)/Substance Abuse and Mental Health Services Administration (SAMHSA)	Substance Abuse Prevention and Treatment Block Grant Program	Block	Awarded to states to help plan, implement, and evaluate activities that prevent and treat substance abuse including through school-based programs ^b
HHS/SAMHSA	State Targeted Response to the Opioid Crisis Grant Program	Formula	Awarded to states to address the opioid crisis through prevention, treatment, and recovery activities for opioid use disorder including through schools
HHS/SAMHSA	State Opioid Response Grants Program	Formula	Awarded to states to address the opioid crisis through prevention, treatment, and recovery activities for opioid use disorder including through schools
Office of National Drug Control Policy (ONDCP)	Drug-Free Communities Support Program	Discretionary	Awarded to community-based coalitions to support drug prevention efforts through the engagement of schools, law enforcement, and other sectors of a community

Source: GAO analysis of agency documentation. | GAO-21-96

^aState educational agencies allocate these funds to school districts. School districts receiving an allocation of \$30,000 or more must use at least 20 percent of their allocations to support student safety and health activities. See 20 U.S.C. § 7116(e)(2)(D).

^bAccording to SAMHSA officials, states use these funds to support the needs and strategies they identify related to prevention and treatment.

Figure 3: Total Funding for Selected Federal Grant Programs That May be Used to Support Drug Prevention Activities in Schools, Fiscal Year 2019



Source: GAO analysis of agency documentation and National Drug Control Strategy Fiscal Year 2021 Budget and Performance Summary. | GAO-21-96

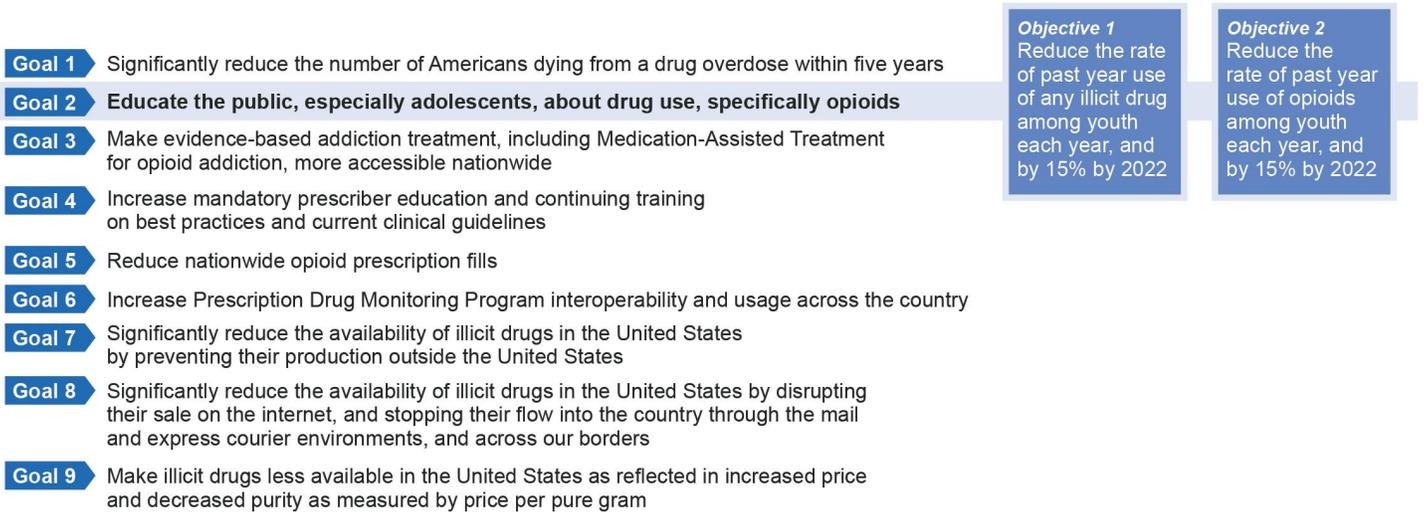
Note: This figure represents five key grant programs identified by GAO and agency officials that may be used to support drug prevention activities in schools during fiscal year 2019. No data exist to determine the actual amounts spent on these activities. With the exception of the Student Support and Academic Enrichment Grant program, all of these programs are included in the federal drug control budget for fiscal year 2019. For the Substance Abuse Prevention and Treatment Block Grant, SAMHSA requires each grantee to spend no less than 20 percent of their grant amount on primary prevention strategies. 45 C.F.R. § 96.124(b)(1).

^aThe number of local educational agencies that received funding under the Student Support and Academic Enrichment Grant program is as of fiscal year 2018 which is the most recent data available.

National Drug Control Strategy

The 2020 National Drug Control Strategy includes nine goals and 17 related objectives, as well as performance measures for programs that support the Strategy. Goal 2—educate the public, especially adolescents, about drug use, specifically opioids—and its two objectives relate to drug prevention activities in schools. While the goal is to provide drug prevention education, the objectives relate to specific annual reductions in drug use by youth (see fig. 4). We refer to this goal as the prevention education goal of the National Drug Control Strategy for the purposes of this report.

Figure 4: Prevention Education Goal and Related Objectives Included in the 2020 National Drug Control Strategy



Source: GAO analysis of 2020 National Drug Control Strategy Performance Reporting System. | GAO-21-96

Our past work has highlighted the importance of performance measurement when implementing strategic plans. For example, we previously reported that measuring performance allows organizations to track the progress they are making toward long-term goals, and gives managers critical information on which to base decisions for improving programs that support those goals.¹³ Specifically, performance goals establish intended performance, and performance measures can be used to assess progress towards achieving those goals.

Evidence-Based Drug Prevention Activities

Beyond performance information, other types of evidence—such as statistics, research and analysis, and program evaluations—can provide useful insights into the effectiveness and results of federal programs. Congress and the Executive Branch have taken actions intended to strengthen federal evidence-building activities. For example, enacted in January 2019, Congress passed the Foundations for Evidence-Based Policymaking Act of 2018. The act created a framework intended to take a more comprehensive and integrated approach to federal evidence-

¹³GAO, *Managing for Results: Enhancing Agency Use of Performance Information for Management Decision Making*, GAO-05-927 (Washington, D.C.: Sep. 9, 2005).

building activities.¹⁴ Our prior work highlights the importance of federal evidence-building, including generating new evidence and using that evidence to support learning and decision-making processes.¹⁵ Executive agencies have also taken actions, including implementing evidence-based educational programs—programs that research shows have been effective—for preventing drug misuse.

In 2016, we identified several evidence-based educational programs which are implemented in schools and other community settings and focus more broadly on combatting risky behaviors, promoting a broad range of protective factors, and strengthening family and community ties.¹⁶ The National Institute on Drug Abuse (NIDA) has identified several examples of evidence-based educational programs administered in schools including *Life Skills*, *Strengthening Families Program: For Parents and Youth 10-14*, and *Guiding Good Choices*. According to NIDA, all of these programs were tested in a family, school, or community setting with positive results. Other organizations, such as *Drug Abuse Resistance Education (D.A.R.E.)*, have taken steps to adopt evidence-based drug prevention educational programs.¹⁷

Flexible Grants Support a Variety of Drug Prevention Activities in Schools; Federal Monitoring Focuses on Compliance with Program Requirements

Education, SAMHSA, and ONDCP support drug prevention activities in schools through six key grant programs that may be used to fund a wide

¹⁴Pub. L. No. 115-435, 132 Stat. 5529 (Jan. 14, 2019).

¹⁵GAO, *Evidence-Based Policymaking: Selected Agencies Coordinate Activities, but Could Enhance Collaboration*, [GAO-20-119](#) (Washington, D.C.: Dec. 4, 2019).

¹⁶GAO, *Highlights of a Forum: Preventing Illicit Drug Use*, [GAO-17-146SP](#) (Washington, D.C.: Nov. 14, 2016). Drug use prevention activities include things like setting policies that reduce the availability of substances in a community, teaching adolescents how to resist negative social influences, and communicating the harms of substances such as the nonmedical use of prescription opioids and marijuana through media campaigns.

¹⁷D.A.R.E. has adopted a new program for elementary and middle school students. D.A.R.E. described the program as an evidence-based approach that is based on social emotional learning theory which helps provide youth with the knowledge and skills needed for responsible decision-making. Officials from D.A.R.E. said this program was in the process of being evaluated for effectiveness when taught by law enforcement officers.

range of activities. That is, these grants are flexible enough to support drug prevention education programs in schools for grantees who choose to use their funds in this way. However, grantees are generally not required to use their funds for drug prevention in schools or to separately report funding or performance information about prevention activities in schools. For example, Education officials said that, for the SSAE program, it does not require grantees to collect or report data related to funding or information for drug prevention activities in schools, and noted that not all grantees choose to fund these types of activities.

In our discussions with grantees in Washington and Michigan, we learned more about how they used funds from these six federal programs to support drug prevention education programs in schools. Selected grantees in these states also described the extent to which they collected data about the amount they spent on drug prevention activities. Specifically:

- Some school district officials in Michigan said they used School Climate program funds to support behavioral and mental health services that could include drug prevention activities in schools, but they do not collect data about the amount spent on drug prevention activities specifically.
- Grantees we met with used funds from SAMHSA's programs to support a number of drug prevention activities in schools including evidence-based educational programs such as *Life Skills*. State officials in Washington said they used about \$4 million of their SABG program funds to run its Student Assistance Program in selected schools during the 2017-2018 school year which includes the administration of substance-use prevention and intervention activities. Officials from a school district in Washington said they used SABG funds during the 2018-2019 school year to administer four drug prevention programs. Officials in Michigan said one of its county health departments used SABG program funds to help support three employees that can administer drug use prevention activities in selected schools. Finally, officials from one DFC coalition we met with in Michigan said they received funds through the SABG, State Targeted Response, and State Opioid Response programs to support its community-based drug prevention efforts which include drug prevention activities in schools.
- Officials from the same DFC program coalition in Michigan also told us that their coalition administers school-based prevention activities for grades six through eight in selected schools, though it does not

report to ONDCP the amount it specifically spent administering these activities. In addition, they said the drug prevention activities they administer in schools generally help support activities already in place in the schools they serve.

Education, SAMHSA, and ONDCP monitor grantees by focusing on grantees' compliance with program requirements. To ensure grantees' use of federal funds from these six grant programs complies with key grant requirements, Education, SAMHSA, and ONDCP primarily monitor grantees' spending through annual reports. For example, to help monitor grantees' compliance with School Climate and SABG program requirements, Education and SAMHSA, respectively, require grantees to submit annual performance reports that identify how federal funds were spent. For the DFC program, ONDCP monitors how coalitions spent federal funds through semi-annual progress reports.

Education, SAMHSA, and ONDCP also require grantees to report performance information about their programs, however, the requirements do not generally include reporting information specifically about drug prevention activities in schools. For example, for the SSAE program, Education officials said that the agency does not specifically collect information from grantees related to drug use prevention activities in schools, including the number of school districts or schools administering drug prevention activities or the number of students being served through these activities, for the program's annual performance report. For the SABG program, grantees report the number of persons aged 12 to 17 who participated in individual-prevention activities using grant funds, but do not report the number of persons served through school-based programs.

Unlike for the SABG program, SAMHSA was able to report to us some information about each grantee's prevention activities that were administered in schools through the State Opioid Response program. However, SAMHSA does not have similar information for the State Targeted Response program because the grants allow such activities to be administered in a variety of settings, which may or may not include schools. Finally, for the DFC program, ONDCP officials said that while each coalition grantee is required to work with school sector members, ONDCP does not collect information about which coalitions are administering drug prevention activities in schools, including the types of activities being administered. This is because, similar to other flexible grant designs, the grant allows coalitions to fund a wide range of strategies and activities that support community-based prevention.

Ongoing studies about the effectiveness of these programs may provide additional information about how grantees support drug prevention activities in schools. Education and ONDCP have recently commissioned evaluations that may provide information about the effectiveness of the SSAE and DFC programs.¹⁸

- Education commissioned a study in 2019 to help identify how states and school districts were spending federal funds received through the SSAE program. According to its February 2020 report, 18 of 40 states surveyed reported that at least some of their school districts used SSAE funds to administer school-based drug prevention activities during fiscal year 2018.¹⁹ In addition, Education said it plans to conduct another study in early 2022 that will further examine activities supported through the SSAE program. Officials said they may use the information to report on how school districts allocate funds to support opioid abuse prevention and mitigation activities.
- ONDCP conducts an annual year-end evaluation of the DFC program to help determine the extent to which DFC coalitions are meeting the goals of the program, such as by reviewing the coalitions' reporting on program participants' past 30-day use of alcohol, tobacco, marijuana, and prescription drugs. The evaluation also identifies the extent to which DFC coalitions are implementing certain drug prevention activities, among other things.²⁰ According to ONDCP's annual evaluation published in 2019, 97 percent of DFC coalitions reported administering activities to enhance program participants' skills, including through schools, as part of their prevention strategies. In addition, the evaluation found that DFC coalitions worked with school sector members to plan school-based strategies, such as student wellness activities, prevention curricula, and professional development for teachers and staff. For example, ONDCP officials

¹⁸SAMHSA has not studied the effectiveness of its SABG program in more than 10 years and did not identify any studies regarding the State Targeted Response and State Opioid Response programs. In addition, Education has not studied the effectiveness of the School Climate program.

¹⁹U.S. Department of Education, *Student Support and Academic Enrichment Grants: A First Look at Activities Supported Under Title IV, Part A* (Washington, D.C.: Feb. 2020).

²⁰To assess what DFC coalitions are doing, ONDCP has identified 41 unique prevention activities that are organized by the seven strategies for community change: (1) providing information, (2) enhancing skills, (3) enhancing access/reducing barriers, (4) providing support, (5) educating and informing about modifying and changing policies, (6) changing consequences, and (7) changing physical design.

said that 276 of 721 DFC coalitions reported working with multiple school districts during fiscal year 2018.

Education, SAMHSA, and ONDCP Have Not Fully Defined How Their Programs Support the National Drug Control Strategy

Agencies Must Identify How Their Programs Contribute to National Drug Control Strategy Goals and Report Related Performance Information

The National Drug Control Program agencies are responsible for reporting on their performance related to achieving goals included in the National Drug Control Strategy. According to ONDCP guidance, most recently updated in October 2019, these agencies are required to identify performance measures that will be used to assess their programs' contributions to achieving each goal and objective of the Strategy.²¹ ONDCP also reports agencies' contributions to achieving goals included in the Strategy. For example, as part of its Fiscal Year 2021 Budget and Performance Summary, ONDCP published an Implementation Plan in June 2020. The Implementation Plan identifies which goals of the Strategy each National Drug Control Program agency will contribute to and the efforts, actions, and programs related to achieving each goal. ONDCP officials told us that the Implementation Plan represents their expectation that each agency will identify how its drug control activities contribute to each of the Strategy's goals and will report performance information related to its drug control activities. Of the six grant programs in our review, we assessed how four of them contribute to the Strategy. We did not assess Education's SSAE program because it is not included in the federal drug control budget, and did not assess HHS's

²¹According to ONDCP's October 2019 guidance, in formulating drug control budgets, each agency and bureau should consider resource needs to support the Strategy's funding priorities. Each agency and bureau shall also identify the performance measures that will be used to assess its contributions toward achieving each goal, objective, and target of the Strategy. A similar requirement was also included in the previous version of the guidance dated May 2018. The federal drug control budget is one of the companion documents of the National Drug Control Strategy that contains performance information.

State Targeted Response program because it did not receive funding in fiscal year 2019.

Our prior work also reinforces the importance of organizations measuring performance to track the progress they are making toward goals. We previously reported nine attributes of successful performance measures that can assist agencies in attaining their goals and mission.²² Two of these attributes are particularly relevant to assessing how programs contribute to agency goals—core program activities and linkage. We used these two attributes to assess how National Drug Control Program agencies measure their programs' contributions to the Strategy.

- **Core program activities:** Performance measures should cover the activities an entity is expected to perform to support the intent of the program. In practice, therefore, in the National Drug Control Strategy, the relevant agencies should identify at least one prevention related performance measure for all programs that support drug prevention.
- **Linkage:** Performance measures should align with division and agency wide goals and mission. In practice, therefore, National Drug Control Program agencies should ensure there is a clear and direct relationship between their programs' performance measures and the goals and objectives of the National Drug Control Strategy.

Education Could Improve Performance Information for Its Prevention Activities and More Fully Describe How These Activities Support the National Drug Control Strategy

We found mixed results for Education's School Climate program which includes two components, with respect to our two key selected attributes for successful performance measures—core program activities and linkage.

School Climate Program Grants to School Districts

- **Core program activities:** For fiscal year 2019, Education reported four performance measures for School Climate program grants to

²²Our prior work establishes nine attributes of successful performance measures: linkage, clarity, measurable target, objectivity, reliability, core program activities, limited overlap, balance, and government-wide priorities. [GAO-03-143](#).

school districts.²³ Two of the four performance measures were related to prevention. Because these grants support drug prevention, the related performance measures reflect the program's core program activities.

- **Linkage:** The same two of Education's four performance measures for School Climate program grants to school districts fully reflect the attribute for linkage, because we found a clear and direct relationship between these performance measures and the prevention education goal of the Strategy and its related objectives. For example, Education requires school districts to report on suspensions and expulsions specifically related to possession or use of drugs. Prior to fiscal year 2019, Education only required grantees to report overall suspension and expulsion data. We determined that the revised measure will help Education assess drug prevention efforts in schools because the grantees now must capture the cause of the discipline. In addition, in 2019, Education began requiring school districts to report on the number of schools implementing opioid abuse prevention and mitigation strategies.

School Climate Program Grants to States

- **Core program activities:** Although prevention is a core program activity of the School Climate program grants to states, Education did not report any performance measures for this component of the School Climate program. Therefore, there were no performance measures to reflect the program's core program activities. However, during the course of our review, Education officials told us that, in response to a 2018 competitive preference for state grant applicants that planned to incorporate opioid abuse prevention and mitigation strategies into their grant activities, 13 of 14 state grantees planned to use such strategies when using federal funds through the School

²³The Fiscal Year 2019 Accounting of Drug Control Funds and Performance Summary, which supplements the Strategy, identifies four performance measures for the School Climate program grants to school districts. However, Education refers to eight performance measures because they report information related to the number and the percentage of schools for each of the four performance measures.

Climate program.²⁴ Therefore, Education said that it may be possible to collect data from grantees related to this competitive priority in the annual performance reports already required of grantees.

- **Linkage:** Education did not identify performance measures for the state component of the School Climate program; absent performance measures, we could not evaluate linkage. Education cited a variety of reasons for this decision. For example, Education officials said the activities supported through this component of the program are too far removed from the drug prevention programs implemented in schools to measure how they support the Strategy. In addition, state grantees may assist school districts in implementing behavioral support systems for students through training and technical assistance events that do not necessarily focus on drug prevention. Further, officials told us that the School Climate program is primarily included in the federal drug control budget because it is the successor to the department's only drug prevention program that had been included in the federal drug control budget during prior fiscal years.²⁵ In commenting on a draft of this report, Education also said that it views the School Climate program overall—rather than the individual school district and state component parts of the program—as the unit of analysis requiring performance measures. Education further noted that the department's Office of Inspector General approved this approach as part of its periodic review of Education's contributions to the National Drug Control Strategy.

Including more complete performance information for Education's prevention activities included in the federal drug control budget could help shed light on how Education's annual investment of approximately \$10 million in grants to states through the School Climate program contributes to achieving the prevention education goal of the National Drug Control Strategy.

²⁴Applications for New Awards; School Climate Transformation Grant program - State Educational Agency Grants, 83 Fed. Reg. 35,465, 35,466 (July 26, 2018). Education also included a competitive preference in its funding opportunity announcement for school districts during fiscal year 2019 and officials reported that 68 of 69 school district grantees planned to use such strategies. Applications for New Awards; School Climate Transformation Grant Program - Local Educational Agency Grants: 84 Fed. Reg. 26,829, 26,830 (June 10, 2019).

²⁵Prior to administering the School Climate Transformation Grant program in fiscal year 2014, Education administered the Safe and Drug-Free Schools and Communities program, which started out exclusively as a drug prevention program, according to agency officials.

SAMHSA Did Not Fully Link Key Funding and Performance Measures for Prevention Activities to the National Drug Control Strategy

We also found mixed results for SAMHSA's two key grant programs that can support drug prevention education programs with respect to our two key selected attributes for successful performance measures—core program activities and linkage.

SABG Prevention Set-aside

- **Core program activities:** SAMHSA reported two performance measures for the SABG prevention set-aside that fully reflected the attribute for core program activities, because both were related to prevention.
- **Linkage:** Although SAMHSA reported that the SABG prevention set-aside supports prevention activities, SAMHSA did not identify performance measures for this program as contributing to the prevention education goal of the Strategy. Instead, SAMHSA linked both of these measures to a goal in the Strategy focused on making addiction treatment more available.²⁶ However, we found that one of the SABG prevention set-aside measures—which measures the percent of states showing decreased 30-day use of illicit drugs among adolescents—contains language that also appears to fit with the prevention education goal of the Strategy. This performance measure, which uses data from the National Survey on Drug Use and Health, contains specific language found in the prevention education goal and objectives of the Strategy and focuses on past use of illicit drugs by youth.

State Opioid Response Program

- **Core program activities:** We found that SAMHSA's performance measures for the State Opioid Response program partially reflect its core program activities. Although SAMHSA reported three performance measures for the State Opioid Response program, all three measures focused on treatment or recovery services only.

²⁶SAMHSA reported that the prevention set-aside is related to Goal 3 of the Strategy: Evidenced based addiction treatment, including Medication-Assisted Treatment for opioid addiction, is more accessible nationwide (see fig. 4).

- **Linkage:** SAMHSA officials told us that the program contributes to states' prevention efforts and that some grantees used these funds for prevention activities, including school-based prevention programs. However, SAMHSA officials said all funding provided for the State Opioid Response program is allocated to its Center for Substance Abuse Treatment, which is focused on promoting treatment and recovery services. Therefore, SAMHSA has not developed a methodology to calculate how this program may also support prevention activities. Absent performance measures related to prevention, we could not evaluate linkage.

SAMHSA has reported that other drug control programs it administers contribute to more than one function of the Strategy, including the SABG program, and has developed a methodology to calculate those contributions, but it has not done so for the State Opioid Response program. Without complete performance measures for its prevention activities, SAMHSA cannot fully account for how its investment in the SABG prevention set-aside and State Opioid Response program contributes to the National Drug Control Strategy. Specifically, SAMHSA does not measure contributions to the prevention education goal of the Strategy through the SABG prevention set-aside, an approximately \$372 million annual investment which represents about 17 percent of the federal drug control budget for prevention. In addition, SAMHSA has not considered how its contributions through the State Opioid Response program, a \$1.5 billion annual investment, may contribute to achieving the prevention education goal of the Strategy.

ONDCP Did Not Report How the DFC Program Supports the National Drug Control Strategy

The DFC program was listed in the prevention function of the federal drug control budget during fiscal year 2019, but ONDCP did not report any performance measures or document how the DFC program contributes to achieving specific goals included in the Strategy. In addition, ONDCP did not list the DFC program in its Implementation Plan, which officials said identifies how each National Drug Control Program agency's activities contribute to the Strategy's goals. When we asked ONDCP officials about this discrepancy, they confirmed the DFC program contributes to the prevention education goal of the Strategy even though its Implementation Plan did not report this program as being related to achieving this goal.

DFC Program

- **Core program activities:** One of the DFC program's purposes is to prevent and reduce substance abuse among youth. ONDCP does not report any performance measures related to prevention in the Strategy for the DFC program, and therefore did not reflect the attribute for core program activities.
- **Linkage:** ONDCP has not reported on how any of the four performance measures for the DFC program contribute to the Strategy as required, even though at least one of the program's four existing performance measures is related to the prevention education goal of the Strategy. For example, we found a direct relationship between one of the measures—past 30-day use of alcohol, tobacco, marijuana, and prescription drugs among students in three grades from sixth to twelfth—and both objectives of the prevention education goal of the Strategy.

While ONDCP officials told us that it gathers and reports on performance measures for the DFC program on its website, the National Drug Control Strategy and companion documents do not include this information, nor do any of the documents explicitly state which goals of the Strategy the DFC program supports. ONDCP officials further stated that the agency is not statutorily required to report performance measures to itself, for example, by reporting the measures for the DFC program as part of ONDCP's development of the National Drug Control Assessment, a companion document to the Strategy.²⁷ However, the National Drug Control Assessment is statutorily required to include a summary of each National Drug Control Program agency's progress toward achieving the goals in the Strategy, using the performance measures set forth in the Strategy.²⁸

As stated previously, ONDCP's guidance requires each National Drug Control Program agency to identify the performance measures that will be used to assess its contributions toward achieving each goal, objective, and target of the Strategy. However, ONDCP did not comply with its own guidance, which requires each National Drug Control Program agency to report such measures. ONDCP is in a unique position, having statutory responsibility for the National Drug Control Strategy, as well as

²⁷Under 21 U.S.C. § 1705(g)(2), the head of each National Drug Control Program agency is required to submit to ONDCP an evaluation of progress made by the agency with respect to the National Drug Control Strategy goals, using the performance measures for the agency developed in the Strategy.

²⁸See 21 U.S.C. § 1705(g)(1) and (3).

administering the DFC program, which is listed in the federal drug control budget like the drug control activities being administered by Education and SAMHSA. Without including performance measures for the DFC program for inclusion in the Strategy or other companion documents, ONDCP cannot fully ensure that Congress and the public understand how its annual investment of approximately \$100 million in the DFC program contributes to the National Drug Control Strategy, which represents about 5 percent of the federal drug control budget for prevention.

Conclusions

School-age children, particularly adolescents, are especially vulnerable to the terrible effects of drug misuse. Providing drug prevention education and preventing and treating drug misuse are pillars of the National Drug Control Strategy. The Strategy is meant to present a complete picture of all the resources and efforts the nation has gathered in that fight.

Federal agencies can and must work to ensure that available federal resources are aligned to achieve the prevention goals outlined in the Strategy. However, we found that HHS and ONDCP have incomplete performance measures for some of their prevention education programs, and do not fully identify how key grants that can support drug prevention education programs contribute to the prevention goals of the Strategy, as required by ONDCP guidance. We also found that better information on Education's School Climate grants to states could shed light on how this portion of the program supports the Strategy. Doing so could help ONDCP; Congress; federal, state, local, and tribal governments; and the public better understand and assess how the federal investment in these programs may help address the drug crisis and ultimately achieve the prevention education goal of the Strategy.

Recommendations for Executive Action

GAO is making a total of four recommendations, including one to Education, two to HHS, and one to ONDCP. Specifically:

The Secretary of Education should work with grantees to collect and report performance information for the grants to state educational agencies component of the School Climate program that relate to achieving the prevention education goal of the National Drug Control Strategy. (Recommendation 1)

The Secretary of Health and Human Services should clarify how the Substance Abuse Prevention and Treatment Block Grant (SABG) prevention set-aside contributes to the goals of the National Drug Control Strategy, including considering how the performance measures relate to the prevention education goal. (Recommendation 2)

The Secretary of Health and Human Services should determine how the State Opioid Response program contributes to the prevention goals of the National Drug Control Strategy and develop performance measures that relate to achieving those goals including the prevention education goal. (Recommendation 3)

The Director of ONDCP should report performance measures for the Drug-Free Communities Support program and clarify how those measures are being used to assess the program's contributions to achieving specific goals of the National Drug Control Strategy, in the relevant Strategy documents. (Recommendation 4)

Agency Comments and Our Evaluation

We provided a draft of this report to Education, HHS, and ONDCP for review and comment. HHS and ONDCP agreed with our recommendations, and Education partly concurred. Their comments are reproduced in appendixes I, II, and III. Education and HHS also provided technical comments, which we incorporated, as appropriate.

In its comments, Education stated that it believes it complied with ONDCP's guidance to identify performance measures for the School Climate program that align with the National Drug Control Strategy's goals and objectives through the grants to school districts. Specifically, it said that ONDCP's guidance applies to the program overall rather than to each component part—an approach approved of by Education's Office of Inspector General—and that its performance measures for the school district portion of the program are therefore sufficient. However, as we noted in the draft report, in response to a 2018 competitive preference for state grant applicants that planned to incorporate opioid abuse prevention and mitigation strategies into their grant activities, 13 of 14 state grantees planned to use such strategies when using federal funds through the School Climate program. Therefore, Education said it would explore collecting performance data related to opioid abuse prevention and mitigation from these grantees and make an effort to report such information. Upon reviewing this new information, we agree with

Education and have modified the report and corresponding recommendation accordingly.

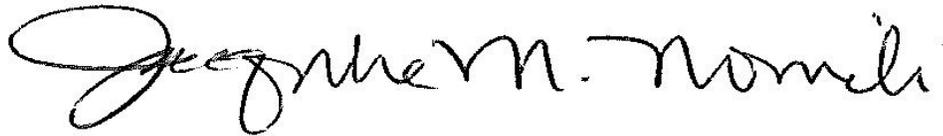
In its comments, HHS said it would work with ONDCP to determine performance measures for the SABG prevention set-aside and State Opioid Response program that align with the Strategy's goals and objectives. HHS also asked us to consider existing data from the National Survey on Drug Use and Health in our assessment of its performance measures for the SABG prevention set-aside. We agree that these data are important, and note in the draft report on which HHS commented that at least one performance measure for the SABG prevention set-aside currently uses these data.

In its comments, ONDCP said it would work to develop performance measures for the DFC program used to assess the program's contributions to future iterations of the Strategy.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Education, the Secretary of Health and Human Services, and the Director of the Office of National Drug Control Policy. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

Appendix I: Comments from the Department of
Education

If you or your staff have any questions about this report, please contact me at (617) 788-0580 or nowickij@gao.gov. Contact points for our offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.

A handwritten signature in black ink that reads "Jacqueline M. Nowicki". The signature is written in a cursive style with a large, looping initial "J".

Jacqueline M. Nowicki, Director
Education, Workforce, and Income Security Issues

Appendix I: Comments from the Department of Education



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

November 4, 2020

Ms. Jacqueline M. Nowicki
Director
Education, Workforce,
And Income Security Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Nowicki:

Thank you for the opportunity to review the U.S. Government Accountability Office's (GAO) draft report, *Agencies Have Not Fully Identified How Grants That Can Support Drug Prevention Education Programs Contribute to National Goals* (GAO-21-96). We appreciate the work that went into this audit and the importance of the general topic of drug prevention. I am pleased to provide the Department's response to the draft report's recommendation to the U.S. Department of Education (Department).

GAO's recommendation – *The Secretary of Education should identify performance measures for the grants to state educational agencies component of the School Climate program that relate to achieving the prevention goal of the National Drug Control Strategy.*

We can only concur in part as discussed below, and as discussed earlier with GAO the Department did not create performance measures for the 2018 cohort of state educational agency (SEA) School Climate Transformation Grants (SCTG) for three reasons.

First, the SEA grants are focused on technical assistance and related support to local educational agencies (LEAs) in implementing multi-tiered behavioral frameworks that assist in the selection of a wide range of evidence-based interventions for improving behavioral outcomes and learning conditions for all students, including, where appropriate and supported by a local needs assessment, drug abuse prevention and mitigation. The Department has found it challenging to establish meaningful performance measures for the SCTG – SEA program related to drug prevention since the program focuses primarily on technical assistance. In this case, the Department believed that the LEA SCTG program was a better candidate for performance measurement related to drug prevention because of its focus on direct services. Although drug prevention is an authorized or allowable activity in several programs, it has not been a core focus of any single OESE program for over a decade.

Second, the Department believes that the Office of National Drug Control Policy (ONDCP) guidance on performance measures does not require such measures for each and every program activity that supports the National Drug Control Strategy. Rather, the Department's decision to establish performance measures for the LEA component of the SCTG program was appropriate

Appendix I: Comments from the Department of Education

Page 2 – Jacqueline M. Nowicki

and sufficient to comply with the ONDCP guidance. We further note that this decision has been approved by the Department’s Office of Inspector General, which, in accordance with the authorizing statute, periodically reviews our contribution to the National Drug Control Strategy.

Third, the Department believes, based on past experience, that adding new performance measures in the middle of a grant cycle (the 2018 SEA SCTG grantees are roughly halfway through their project periods) would be unlikely to yield meaningful performance data and thus would impose needless administrative burden at a time when project implementation already is complicated by the COVID-19 pandemic.

The Department does believe that it may be possible to collect limited data on the quantity of technical assistance and other outreach related to the competitive priority on opioid abuse prevention and mitigation as part of the annual performance reports (APRs) already required of grantees. For example, the Department may be able to collect data on the number of LEAs that have requested information or support related to that priority. Assuming ONDCP agrees that such information would help clarify the extent to which the SEA SCTG program is contributing to the National Drug Control Strategy, the Department will explore the feasibility of adding such a request to the APR process, and thus, make a reasonable effort consistent with some of the substance of the recommendation to the extent feasible. We would also be glad to discuss some refinements to the recommendation consistent with the views outlined above. Please let us know if you would like to discuss this further.

If you have questions or need additional information, we remain available to assist in this important work, please let us know. We look forward to receiving the final report.

Sincerely,

**Mark
Washington**

Digitally signed by Mark
Washington
Date: 2020.11.04
16:37:40 -05'00'

Mark Washington
Deputy Assistant Secretary
Office of Elementary and Secondary Education

Text of Appendix I: Comments from the Department of Education

Page 1

UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

November 4, 2020

Ms. Jacqueline M. Nowicki Director
Education, Workforce,
And Income Security Issues

U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Nowicki:

Thank you for the opportunity to review the U.S. Government Accountability Office's (GAO) draft report, Agencies Have Not Fully Identified How Grants That Can Support Drug Prevention Education Programs Contribute to National Goals (GAO-21-96). We appreciate the work that went into this audit and the importance of the general topic of drug prevention. I am pleased to provide the Department's response to the draft report's recommendation to the U.S. Department of Education (Department).

GAO's recommendation – The Secretary of Education should identify performance measures for the grants to state educational agencies component of the School Climate program that relate to achieving the prevention goal of the National Drug Control Strategy.

We can only concur in part as discussed below, and as discussed earlier with GAO the Department did not create performance measures for the 2018 cohort of state educational agency (SEA) School Climate Transformation Grants (SCTG) for three reasons.

First, the SEA grants are focused on technical assistance and related support to local educational agencies (LEAs) in implementing multi-tiered behavioral frameworks that assist in the selection of a wide range of evidence-based interventions for improving behavioral outcomes and learning conditions for all students, including, where appropriate and supported by a local needs assessment, drug abuse prevention and mitigation. The Department has found it challenging to

establish meaningful performance measures for the SCTG – SEA program related to drug prevention since the program focuses primarily on technical assistance. In this case, the Department believed that the LEA SCTG program was a better candidate for performance measurement related to drug prevention because of its focus on direct services. Although drug prevention is an authorized or allowable activity in several programs, it has not been a core focus of any single OESE program for over a decade.

Second, the Department believes that the Office of National Drug Control Policy (ONDCP) guidance on performance measures does not require such measures for each and every program activity that supports the National Drug Control Strategy. Rather, the Department’s decision to establish performance measures for the LEA component of the SCTG program was appropriate

Page 2

Page 2 – Jacqueline M. Nowicki

and sufficient to comply with the ONDCP guidance. We further note that this decision has been approved by the Department’s Office of Inspector General, which, in accordance with the authorizing statute, periodically reviews our contribution to the National Drug Control Strategy.

Third, the Department believes, based on past experience, that adding new performance measures in the middle of a grant cycle (the 2018 SEA SCTG grantees are roughly halfway through their project periods) would be unlikely to yield meaningful performance data and thus would impose needless administrative burden at a time when project implementation already is complicated by the COVID-19 pandemic.

The Department does believe that it may be possible to collect limited data on the quantity of technical assistance and other outreach related to the competitive priority on opioid abuse prevention and mitigation as part of the annual performance reports (APRs) already required of grantees. For example, the Department may be able to collect data on the number of LEAs that have requested information or support related to that priority. Assuming ONDCP agrees that such information would help clarify the extent to which the SEA SCTG program is contributing to the National Drug Control Strategy, the Department will explore the feasibility of adding such a request to the APR process, and thus, make a reasonable effort consistent with some of the substance of the recommendation to the extent feasible. We would also be glad to discuss some refinements to the recommendation consistent with the views outlined above. Please let us know if you would like to discuss this further.

**Appendix I: Comments from the Department of
Education**

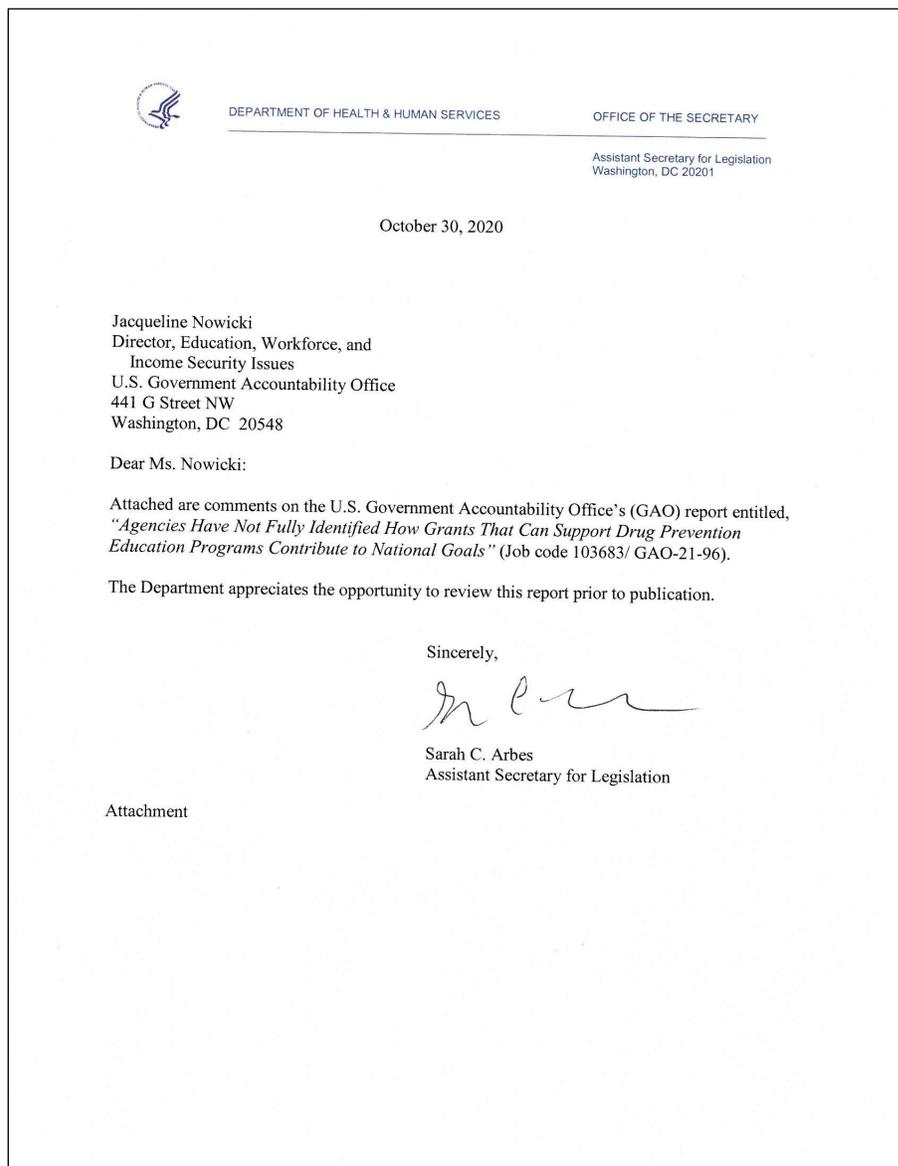
If you have questions or need additional information, we remain available to assist in this important work, please let us know. We look forward to receiving the final report.

Sincerely,

Mark Washington
Deputy Assistant Secretary

Office of Elementary and Secondary Education

Appendix II: Comments from the Department of Health and Human Services



**Appendix II: Comments from the Department
of Health and Human Services**

GENERAL COMMENTS FROM THE DEPARTMENT OF HEALTH & HUMAN SERVICES ON THE GOVERNMENT ACCOUNTABILITY OFFICE'S DRAFT REPORT ENTITLED: DRUG MISUSE: AGENCIES HAVE NOT FULLY IDENTIFIED HOW GRANTS THAT CAN SUPPORT DRUG PREVENTION EDUCATION PROGRAMS CONTRIBUTE TO NATIONAL GOALS (GAO-21-96)

The U.S. Department of Health & Human Services (HHS) appreciates the opportunity from the Government Accountability Office (GAO) to review and comment on this draft report.

Overarching Comments:

GAO's recommendation states that HHS should consider how its performance measures relate to the prevention education goal. However, SAMHSA is already monitoring SABG performance using past 30 day usage of both marijuana and other illegal drugs in 12-20 year olds from each state using data from the National Survey on Drug Use and Health (NSDUH). Past 30 day usage is the standard performance measure, as it is the best way to gauge current usage of a substance. In addition, using the NSDUH data ensures there is a consistent approach across all recipients of the SABG. SAMHSA encourages GAO to take these public documents and additional prevention programs into account when finalizing their recommendations as this data is organized both nationally and by state in the NSDUH survey and can be considered a performance maker. The report should include that the purpose of the SABG is to support the states' identified needs and strategies, within the context of the National Drug Control Strategy.

Recommendation 2

The Secretary of Health and Human Services should clarify how the Substance Abuse Prevention and Treatment Block Grant (SABG) prevention set-aside contributes to the goals of the National Drug Control Strategy, including considering how the performance measures relate to the prevention education goal. **(Recommendation 2)**

HHS Response

HHS concurs with GAO's recommendation. SAMHSA will engage in discussions with ONDCP to determine appropriate measures for the SABG program that align with the goals and objectives of the National Drug Control Strategy.

Recommendation 3

The Secretary of Health and Human Services should determine how the State Opioid Response program contributes to the prevention goals of the National Drug Control Strategy and develop performance measures that relate to achieving those goals including the prevention education goal. **(Recommendation 3)**

HHS Response

HHS concurs with GAO's recommendation. SAMHSA will engage in discussions with ONDCP to determine appropriate measures for the SOR program that align with the goals and objectives of the National Drug Control Strategy.

Text of Appendix II: Comments from the Department of Health and
Human Services

Page 1

DEPARTMENT OF HEALTH & HUMAN SERVICES
OFFICE OF THE SECRETARY

Assistant Secretary for Legislation
Washington, DC 20201

October 30, 2020

Jacqueline Nowicki
Director, Education, Workforce, and Income Security Issues

U.S. Government Accountability Office
441 G Street NW
Washington, DC 20548

Dear Ms. Nowicki:

Attached are comments on the U.S. Government Accountability Office's (GAO) report entitled, " Agencies Have Not Fully Identified How Grants That Can Support Drug Prevention Education Programs Contribute to National Goals" (Job code 103683/ GAO-21-96).

The Department appreciates the opportunity to review this report prior to publication.

Sincerely,

Sarah C. Arbes
Assistant Secretary for Legislation

Attachment

Page 2

**GENERAL COMMENTS FROM THE DEPARTMENT OF HEALTH & HUMAN
SERVICES ON THE GOVERNMENT ACCOUNTABILITY OFFICE'S DRAFT
REPORT ENTITLED: DRUG MISUSE: AGENCIES HAVE NOT FULLY**

IDENTIFIED HOW GRANTS THAT CAN SUPPORT DRUG PREVENTION EDUCATION PROGRAMS CONTRIBUTE TO NATIONAL GOALS (GAO-21-96)

The U.S. Department of Health & Human Services (HHS) appreciates the opportunity from the Government Accountability Office (GAO) to review and comment on this draft report.

Overarching Comments:

GAO's recommendation states that HHS should consider how its performance measures relate to the prevention education goal. However, SAMHSA is already monitoring SABG performance using past 30 day usage of both marijuana and other illegal drugs in 12-20 year olds from each state using data from the National Survey on Drug Use and Health (NSDUH). Past 30 day usage is the standard performance measure, as it is the best way to gauge current usage of a substance. In addition, using the NSDUH data ensures there is a consistent approach across all recipients of the SABG. SAMHSA encourages GAO to take these public documents and additional prevention programs into account when finalizing their recommendations as this data is organized both nationally and by state in the NSDUH survey and can be considered a performance maker. The report should include that the purpose of the SABG is to support the states' identified needs and strategies, within the context of the National Drug Control Strategy.

Recommendation 2

The Secretary of Health and Human Services should clarify how the Substance Abuse Prevention and Treatment Block Grant (SABG) prevention set-aside contributes to the goals of the National Drug Control Strategy, including considering how the performance measures relate to the prevention education goal.
(Recommendation 2)

HHS Response

HHS concurs with GAO's recommendation.

SAMHSA will engage in discussions with ONDCP to determine appropriate measures for the SABG program that align with the goals and objectives of the National Drug Control Strategy.

Recommendation 3

The Secretary of Health and Human Services should determine how the State Opioid Response program contributes to the prevention goals of the National Drug Control

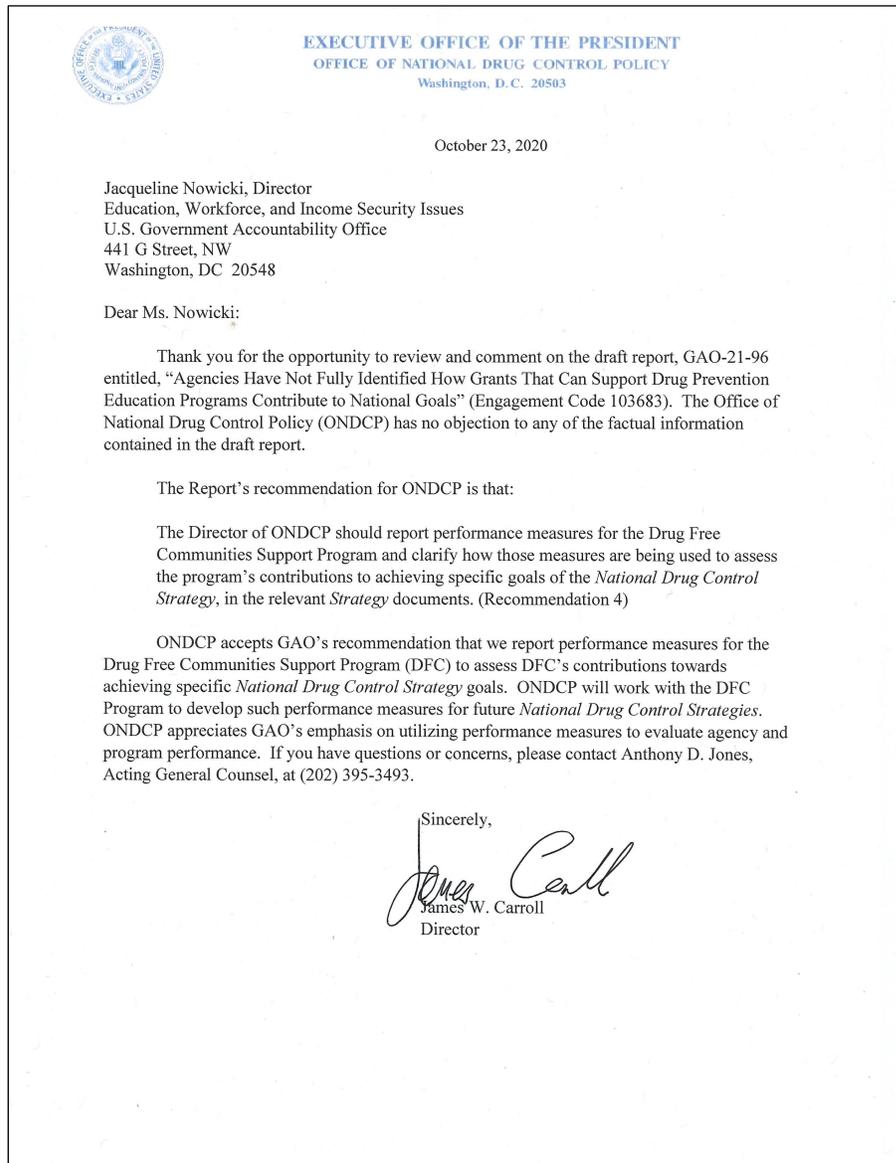
Strategy and develop performance measures that relate to achieving those goals including the prevention education goal. (Recommendation 3)

HHS Response

HHS concurs with GAO's recommendation.

SAMHSA will engage in discussions with ONDCP to determine appropriate measures for the SOR program that align with the goals and objectives of the National Drug Control Strategy.

Appendix III: Comments from the Office of National Drug Control Policy



Text of Appendix III: Comments from the Office of National Drug Control Policy

Page 1

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF NATIONAL DRUG CONTROL POLICY

Washington, D.C. 20503

October 23, 2020

Jacqueline Nowicki,
Director
Education, Workforce, and Income Security Issues

U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Nowicki:

Thank you for the opportunity to review and comment on the draft report, GAO-21-96 entitled, "Agencies Have Not Fully Identified How Grants That Can Support Drug Prevention Education Programs Contribute to National Goals" (Engagement Code 103683). The Office of National Drug Control Policy (ONDCP) has no objection to any of the factual information contained in the draft report.

The Report's recommendation for ONDCP is that:

The Director of ONDCP should report performance measures for the Drug Free Communities Support Program and clarify how those measures are being used to assess the program's contributions to achieving specific goals of the National Drug Control Strategy, in the relevant Strategy documents. (Recommendation 4)

**Text of Appendix III: Comments from the Office
of National Drug Control Policy**

ONDCP accepts GAO's recommendation that we report performance measures for the Drug Free Communities Support Program (DFC) to assess DFC's contributions towards achieving specific National Drug Control Strategy goals. ONDCP will work with the DFC Program to develop such performance measures for future National Drug Control Strategies. ONDCP appreciates GAO's emphasis on utilizing performance measures to evaluate agency and program performance. If you have questions or concerns, please contact Anthony D. Jones, Acting General Counsel, at (202) 395-3493.

Sincerely,

James W. Carroll
Director

Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact

Jacqueline M. Nowicki, (617) 788-0580 or nowickij@gao.gov

Staff Acknowledgments

In addition to the contact named above, Bill Keller (Assistant Director), Brian Egger (Analyst-in-Charge), James Bennett, Holly Dye, Emily Gamelin, Jill Lacey, Benjamin Licht, Patricia Powell, and Calaera Powroznik made significant contributions to this report. Also contributing to this report were Jan Montgomery and James Rebbe.

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