

GAO

Report to the Subcommittee on
Transportation, Treasury, the Judiciary,
Housing and Urban Development, and
Related Agencies, Committee on
Appropriations, U.S. Senate

March 2005

ANTI-DRUG MEDIA CAMPAIGN

An Array of Services
Was Provided, but
Most Funds Were
Committed to Buying
Media Time and Space



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Highlights

Highlights of [GAO-05-175](#), a report to the Chairman and Ranking Member, Subcommittee on Transportation, Treasury, the Judiciary, Housing and Urban Development, and Related Agencies, Committee on Appropriations, U.S. Senate

Why GAO Did This Study

The Office of National Drug Control Policy (ONDCP) was required by the Drug Free Media Campaign Act of 1998 (21 U.S.C. 1801 et seq.) to conduct a national media campaign to reduce and prevent drug use among America's youth. Since 1998, Congress has appropriated over \$1 billion for the media campaign. However, a 2003 report by the Senate Committee on Appropriations expressed some concerns about the media campaign, including concern that a large portion of the campaign's budget had been used for consulting services rather than the direct purchase of media time and space. The report, therefore, directed GAO to review the use of consultants to support the media campaign.

This report describes the services provided by consultants (defined by GAO as the prime contractors and their subcontractors) in support of the media campaign, along with the estimated award amounts for these services.

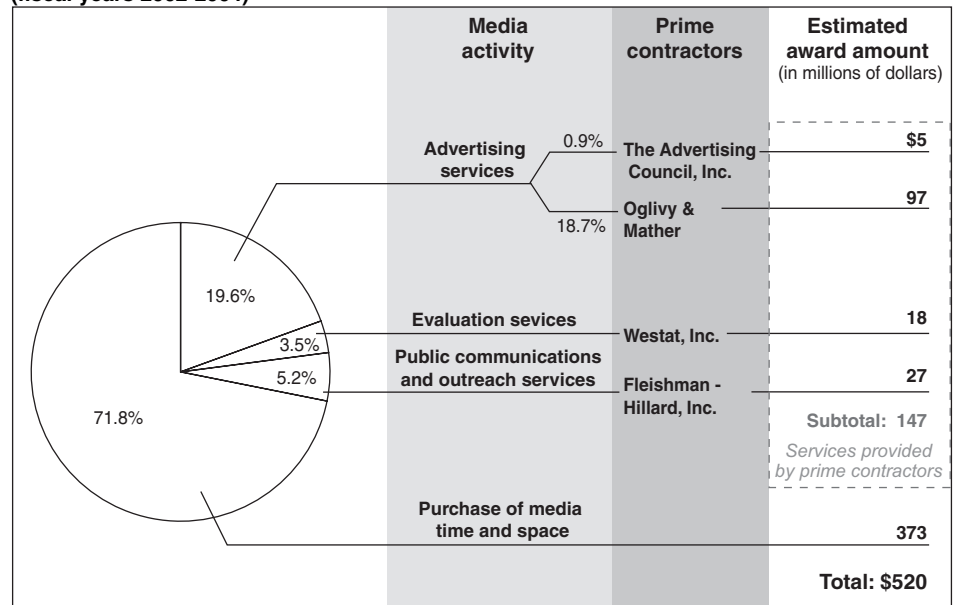
ANTI-DRUG MEDIA CAMPAIGN

An Array of Services Was Provided, but Most Funds Were Committed to Buying Media Time and Space

What GAO Found

Our analysis of contracts covering ONDCP's National Youth Anti-Drug Media Campaign from fiscal years 2002 through 2004 revealed that four contractors provided many of the services required to execute the campaign. These four prime contractors provided an array of services that fell within three broad categories: (1) advertising, (2) public communications and outreach, and (3) evaluation services to gauge the campaign's effectiveness. The prime contractors also acquired additional specialized expertise from 102 subcontractors. Some of the specific tasks performed by the contractors and their subcontractors included conducting qualitative and quantitative research for advertising creation, working with the entertainment industry to portray the negative consequences of drug use in television and movies, and conducting an evaluation intended to measure the effectiveness of the media campaign. Based on our analysis of contracts covering fiscal years 2002 through 2004, we estimated that \$520 million was awarded to the four prime contractors, of which an estimated \$373 million—72 percent—was committed to purchasing media time and space for campaign advertisements. The remaining \$147 million—28 percent—was for the services provided by the prime contractors. Contractors, in turn, awarded \$14 million of that amount to their subcontractors.

Estimated Award Amounts for Contractor Services and Purchase of Media Time and Space (fiscal years 2002-2004)



Source: GAO.

Note: Percentages may not add up to 100 percent due to rounding.

www.gao.gov/cgi-bin/getrpt?GAO-05-175.

To view the full product, including the scope and methodology, click on the link above. For more information, contact Laurie Ekstrand at (202) 512-8777 or ekstrandl@gao.gov.

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Abbreviations

BCEP	Behavioral Change Expert Panel
DCI	data collection instrument
FCEP	Formative Creative Evaluation Panel
MAM	Madison Advertising Management, LTD.
NIDA	National Institute on Drug Abuse
ONDCP	Office of National Drug Control Policy
PDFA	The Partnership for a Drug-Free America
SADD	Students Against Destructive Decisions, Inc.
VNR	video news release

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United States Government Accountability Office
Washington, DC 20548

March 31, 2005

The Honorable Christopher Bond
Chairman
The Honorable Patty Murray
Ranking Member
Subcommittee on Transportation, Treasury, the Judiciary,
Housing and Urban Development, and Related Agencies
Committee on Appropriations
United States Senate

The Office of National Drug Control Policy (ONDCP) is charged with reducing illicit drug use, manufacturing and trafficking, drug-related crime and violence, and drug-related health consequences. To achieve these goals, the office formulates a National Drug Control Strategy that includes multipronged approaches to combating national drug use. Among these approaches is an effort to reduce and prevent drug use among America's youth by conducting educational and community action programs, including a National Youth Anti-Drug Media Campaign. The campaign combines paid and donated advertising with public communications outreach in an effort to change teen and parental beliefs and behaviors regarding drug use.

Congress first authorized funding for the media campaign in fiscal year 1998, with the expectation that demonstrable changes in youth drug behaviors would be apparent within 3 years. Since then, over \$1 billion has been appropriated for the media campaign. In a committee report for the fiscal year 2004 appropriations cycle, the Senate Appropriations Committee asserted that drug use was increasing in spite of the campaign and that some observers had concluded that the campaign was having no noticeable impact.¹ In addition, the report asserted that a large portion of the campaign's budget pays for outside media and advertising consultants. As such, the report expressed concern about the amount of resources consumed by consultants and the extent to which funds were spent for

¹Senate Report No. 108-146, at 143 (2003) accompanied the media campaign's proposed 2004 appropriation in the Transportation, Treasury & General Government Appropriations Bill, 2004, S. 1589, 108th Cong. The media campaign's 2004 appropriation was ultimately enacted as part of the Consolidated Appropriations Act, 2004, P.L. 108-199, 118 Stat. 325 (2004).

consulting services rather than media time and space for advertisements. Given these issues, the committee report directed us to review how consultants were used in support of the media campaign.² This report focuses on the following question: What services did contractors and their subcontractors provide in support of ONDCP's media campaign and what were the estimated award amounts for these services for fiscal years 2002 through 2004? We are currently conducting a separate review examining the design and execution of ONDCP's primary effort to evaluate the media campaign's effectiveness.

To respond to the question for this report, we met with and obtained documentation from officials at ONDCP headquarters and contractor and subcontractor officials in Washington, D.C., and New York City that supported the media campaign. We analyzed the contracts of the prime contractors and their subcontractors to determine the services they provided and the associated estimated award amounts. We used estimated award data because at the time of our review actual expenditure information was not complete. We conducted our work from March 2004 through February 2005 in accordance with generally accepted government auditing standards. Appendix I provides more detailed information about the scope and methodology of our work.

Results in Brief

During fiscal years 2002 through 2004, the four prime contractors we reviewed and their 102 subcontractors provided a variety of services that fell within three broad categories: (1) advertising, (2) public communications and outreach, and (3) evaluation services. Some of the specific tasks they performed included conducting qualitative and quantitative research for advertising creation, working with the entertainment industry to portray the negative consequences of drug use

²The senate committee report that mandated our review did not define the term "consultants." But given the concern expressed by the committee, we focused our review on the prime contractors and their subcontractors used by ONDCP to implement the media campaign. During the period of our review, ONDCP obtained acquisition services to award the contracts in support of its media campaign from the U.S. Navy Fleet Industrial Supply Center (FISC) and GovWorks (a service-for-fee federal acquisition center, operating under the U.S. Department of the Interior's Franchise Fund). Acquisition services included planning, soliciting, awarding, administering, terminating, and closing out all contracts for ONDCP's media campaign. ONDCP's contract management responsibilities included, among other things, developing statements of work and tracking and reporting on contractors' performance. Although the contracts were awarded and managed by FISC and GovWorks on behalf of ONDCP, because ONDCP provided the funding for these contracts, we refer to ONDCP as having used these contractors to implement the media campaign.

in television and movies, and evaluating the campaign's effectiveness. Based on our analysis of contracts awarded for fiscal years 2002 through 2004, we estimated that \$520 million was awarded to the four prime contractors. However, of this \$520 million, an estimated \$373 million—72 percent—was committed to purchasing media time and space for advertisements. The remaining \$147 million—28 percent—was for the services provided by the prime contractors. Of that amount, \$14 million was awarded to the subcontractors by the prime contractors.

In commenting on a draft of this report, the Director of the Office of National Drug Control Policy generally agreed with our findings. ONDCP provided technical comments that have been incorporated into this report where appropriate.

Background

Congressional Authorization and Funding of the Media Campaign

The Drug-Free Media Campaign Act of 1998, 21 U.S.C. 1801 et seq., required the Office of National Drug Control Policy to conduct a national media campaign to reduce and prevent drug abuse among America's youth. The act specified certain uses of funds provided for the media campaign to include (1) the purchase of media time and space; (2) out-of-pocket advertising production costs; (3) testing and evaluation of advertising; (4) evaluation of effectiveness; (5) partnerships with community, civic, and professional groups and with government organizations; (6) collaboration with the entertainment industry to incorporate anti-drug messages in movies, television, Internet media projects, and public information; (7) news media outreach; and (8) corporate sponsorship and participation, among other uses. The act also mandated a matching requirement. To implement this requirement, ONDCP developed a pro bono match program requiring media vendors who sell advertising time or space to the media campaign to provide (1) an equivalent amount of free public service time or space or (2) an equivalent in-kind contribution.

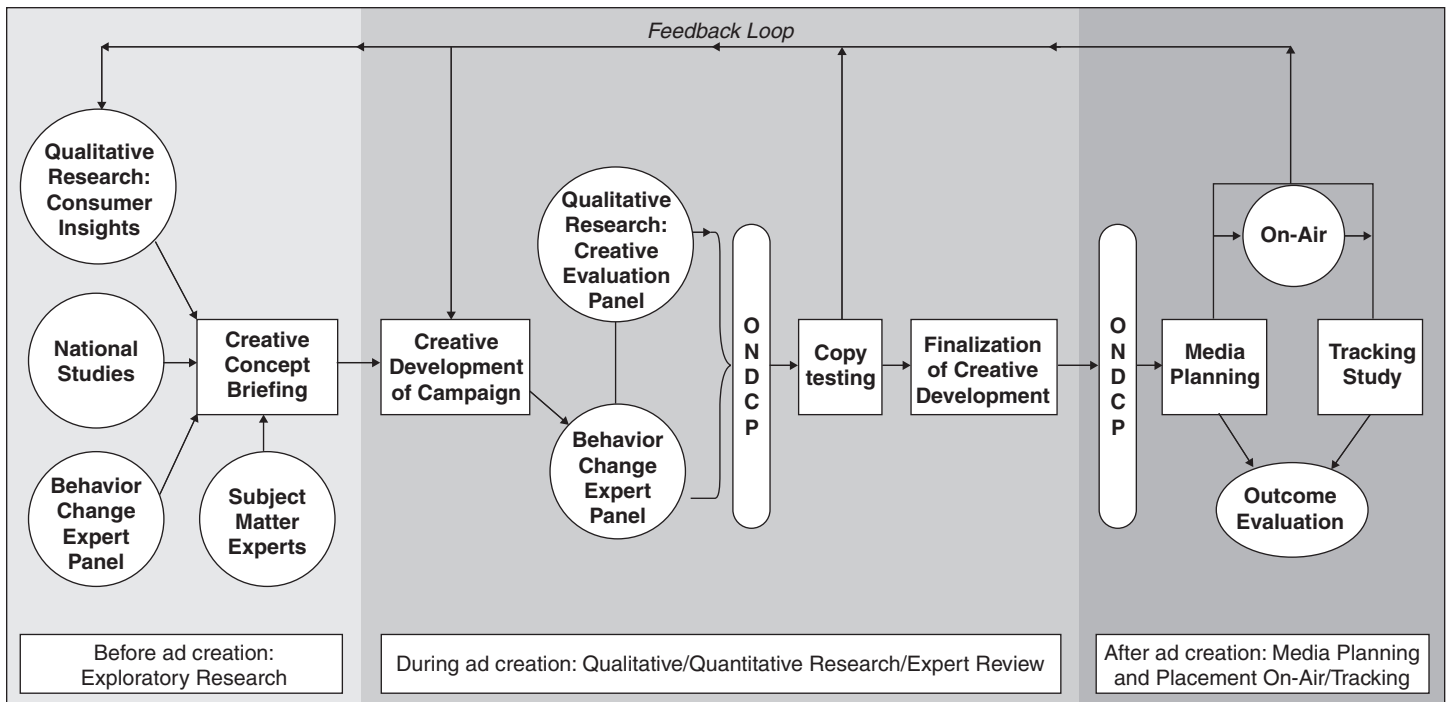
Congress has appropriated over \$1 billion for ONDCP's media campaign since it was initiated in 1998. However, the media campaign's annual appropriations have declined since Congress initially funded the program. ONDCP's 2005 appropriation provides \$120 million for the media campaign, which represents a \$25 million decline from the 2004 appropriation and a \$75 million decline from the first-year funding in 1998.

Media Campaign's Advertising Development and Research Process

The media campaign employs an iterative three-phase advertising development and research process. The first phase, the exploratory research phase, occurs before advertisements are created. For example, before developing the “Monitoring/Love” advertisement series—a message targeting parents, promoting awareness of their children’s whereabouts—extensive research was conducted to help ad creators understand methods of communicating effectively with parents of teens.³ The second phase consists of creating advertisements and subjecting them to research and expert review. For example, in the “Monitoring/Love” series, focus groups were used to assess parents’ reactions to a set of advertising concepts. The concepts were subsequently revised in response to the feedback. Once the concepts were approved by ONDCP, the actual advertisements were produced and tested for effectiveness. The third and final phase begins after the advertisements have been determined to meet ONDCP’s effectiveness standards and involves the strategic placement of the advertisements in television, radio, and print media. For example, the “Monitoring/Love” series advertisements were aired during television shows and radio programs most popular with the target audience, the parents of teens. This phase also involves measuring the effectiveness of specific advertisements over time within target audiences. See figure 1 for a depiction of the three-stage process. Appendix II provides a more detailed description of the campaign’s advertising development and research process.

³An advertising series is a set of three or four advertisements with a common theme.

Figure 1: Media Campaign's Advertising Development/Research Process



Source: Ogilvy & Mather.

Contractor Services in Support of the Media Campaign

ONDCP uses advertising contractors to supplement its in-house capabilities regarding the development, production, and placement of paid advertisements on television, radio, print, and the Internet. The media campaign also used a contractor to provide assistance with public communications and outreach for the campaign, for example, encouraging the entertainment industry to portray the negative consequences of drug use in movies and television. In addition to developing advertisements and conducting public outreach, ONDCP is required to assess whether the media campaign's efforts have been effective in changing American youths' behavior regarding drug use. During fiscal years 2002 through 2004, ONDCP used four prime contractors with varying responsibilities to carry out the campaign's requisite tasks: Ogilvy & Mather, The Advertising Council, Inc. (The Ad Council), Fleishman-Hillard, Inc. (Fleishman-

Hillard), and Westat, Inc. (Westat).⁴ These contractors used funds from their contracts to secure additional specialized expertise from subcontractors.⁵

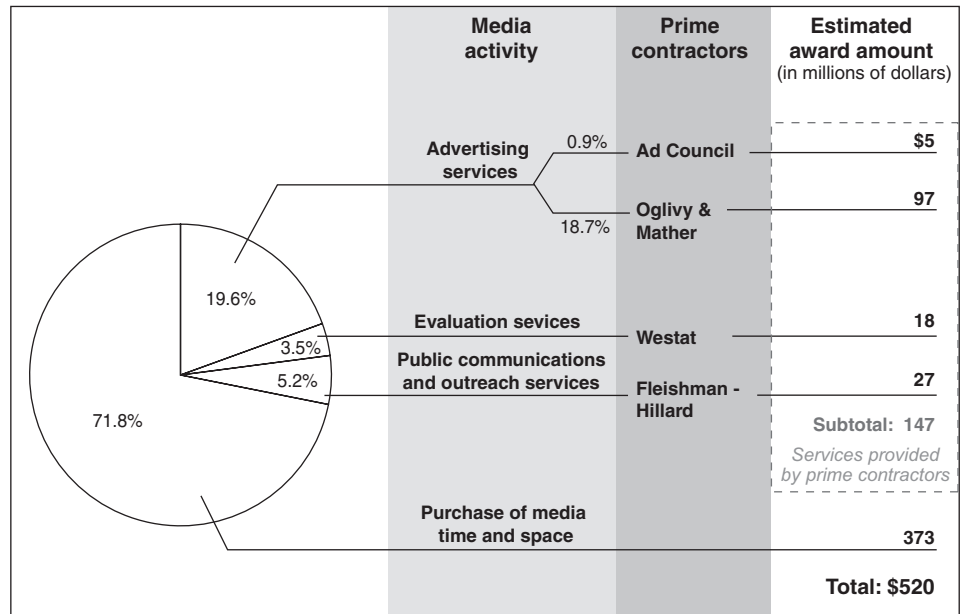
**Prime Contractors
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During fiscal years 2002 through 2004, the four major prime contractors were responsible for a variety of services that generally fall into three broad categories—advertising, public communications and outreach, and evaluation. According to our analysis, an estimated \$520 million was awarded to the prime contractors, of which an estimated \$373 million—72 percent—was committed to purchasing media time and space for advertisements. The remaining \$147 million—28 percent—was for the services provided by the prime contractors.

⁴In its comments on our report, ONDCP disagreed that Westat is a prime contractor of the media campaign because Westat's contract is with the National Institute on Drug Abuse (NIDA), not with ONDCP. Although we are aware that NIDA awarded the evaluation contract to Westat, we considered Westat as a prime contractor of the media campaign for purposes of this report. We did so because ONDCP has statutory responsibility for evaluating the media campaign's effectiveness, see P.L. 105-61, 111 Stat. 1295 (1997), and it entered into an interagency agreement with NIDA for NIDA to award a contract to evaluate ONDCP's media campaign. The interagency agreement provided that ONDCP would fund the evaluation contract through media campaign appropriations and would work with NIDA to ensure that the evaluation met ONDCP program and policy objectives of measuring the campaign's impact.

⁵Two additional prime contractors, the National Clearinghouse of Alcohol and Drug Use Information and the National Institute of Justice, provided clearinghouse services in support of the media campaign. We did not include these contractors in our review because the focus of our review was to examine the services provided by advertising, public communications and outreach, and evaluation contractors.

Figure 2: Estimated Award Amounts for Contractor Services and Purchase of Media Time and Space during Fiscal Years 2002-2004



Source: GAO.

Note: Percentages may not add up to 100 percent due to rounding.

Tasks associated with advertising and advertisement development were performed by prime contractors Ogilvy & Mather and the Ad Council. Ogilvy & Mather was responsible for managing the creative development and production of advertising that is targeted toward changing drug beliefs and behaviors among America's youth and parents. More specifically, Ogilvy & Mather's tasks included (1) media planning, placement, and purchase; (2) qualitative and quantitative research for advertising creation; and (3) advertising assessment and review. The total estimated amount awarded to Ogilvy & Mather for these services was about \$97 million.⁶

The Ad Council was responsible for implementing several specific aspects of the advertising component of the media campaign, including (1) overseeing the use of media match space and time for public service

⁶This estimated award amount does not include the approximate \$373 million included in Ogilvy & Mather's contract that was committed to purchasing media time and space for advertisements. The approximate sum of \$373 million was to cover the cost of the media time and space only and does not include the cost of Ogilvy & Mather's labor associated with negotiating and executing media purchases.

announcements that are not part of the media campaign, (2) creating and managing a community-based anti-drug strategy advertising campaign, and (3) administering reviews of media campaign advertisement production costs. The total estimated amount awarded to the Ad Council for these services was about \$5 million.

The purpose of public communications and outreach, which was implemented by Fleishman-Hillard, was to extend the reach and influence of the campaign through nonadvertising forms of marketing communications. To achieve this end, Fleishman-Hillard's tasks included (1) conducting media outreach—for example, submitting articles relating to key campaign messages such as effective parenting or the effects of marijuana on teen health to newspapers and magazines; (2) building partnerships and alliances—for example, coordinating positive activities for teens with local school and community groups; (3) creating Web sites and exploring other alternative media approaches—for example, designing and hosting message-oriented Web sites such as theantidrug.com; and (4) entertainment industry outreach—for example, encouraging the entertainment industry to portray the negative consequences of drug use in movies and television. The total estimated amount awarded to Fleishman-Hillard for these services was about \$27 million.

To evaluate the effects of the campaign, ONDCP entered into an interagency agreement with the National Institute on Drug Abuse (NIDA). NIDA, in turn, contracted with Westat to design, develop, and implement an evaluation of the outcome and impact of the media campaign in reducing illegal drug use among youth.⁷ To accomplish this, Westat designed a multiphase study to measure the attitudes and behavior of critical target audiences—preteens, teenagers, and parents. The total estimated amount awarded to Westat for these services was about \$18 million.

To fulfill their responsibilities, the prime contractors retained the expertise and services of 102 subcontractors for approximately \$14 million. Table 1 shows the estimated award amounts for subcontractors during fiscal years 2002 through 2004.

⁷Because Westat's contract with NIDA implements ONDCP's statutory requirement of evaluating the media campaign's effectiveness, and because ONDCP funded the Westat contract through media campaign appropriations, we treated Westat as a prime contractor of the media campaign throughout the course of this review.

Table 1: Estimated Award Amounts to Subcontractors during Fiscal Years 2002-2004

Dollars in thousands

Prime contractor	Number of subcontractors	2002	2003	2004	Total
Ogilvy & Mather	20	\$1,059	\$1,926	\$1,880	\$4,865
Ad Council	1	280	210	146	636
Fleishman-Hillard	80	4,165	2,910	834	7,909
Westat	1	218	224	343	785
Total	102	\$5,722	\$5,270	\$3,203	\$14,195

Source: GAO analysis of media campaign contracts.

Ogilvy & Mather retained 20 subcontractors for nearly \$5 million to provide two types of services: (1) multicultural media planning and buying agencies and (2) substance use behavioral change experts, who constituted the Behavioral Change Expert Panel (BCEP). The multicultural subcontractors received more than \$4 million (about 90 percent of the nearly \$5 million awarded by Ogilvy & Mather to subcontractors) for providing marketing services and strategies with regard to specific minority audiences. For example, one subcontractor, Bromley Communications, was responsible for strategically purchasing media time and space for advertisements targeting Hispanic parents and youth. Bromley Communications also provided advice on how to develop effective advertising for Hispanic audiences.

The BCEP received less than \$500,000 (about 10 percent of the \$5 million awarded by Ogilvy & Mather to subcontractors) for applying behavioral science expertise to several aspects of the campaign. For example, one behavioral change expert provided consulting services related to developing drug use prevention messages targeted to parents by reviewing advertising concepts and recommending revisions to enhance effectiveness. See appendix III for a more comprehensive description of these services.

The Ad Council retained one subcontractor, Madison Advertising Management, LTD., (MAM), to provide advertising production cost review services for about \$636,000. MAM was responsible for tracking, analyzing, and managing estimates and invoices detailing the production costs for media campaign advertisements to ensure that production costs were reasonable and adhered to ONDCP guidelines. MAM's goals were to work with the pro bono advertising agencies, their production companies,

ONDCP, The Partnership for a Drug-Free America (PDFA), and the Ad Council to minimize production costs without infringing on the creative process and to maximize the cost efficiency of the media campaign.⁸

Fleishman-Hillard awarded about \$8 million of its total contract award to 80 subcontractors for public communications and outreach services. These subcontractors provided a wide range of services, including photography and video services, research services, Internet technology services, and an assortment of speaker and panelist services. See appendix IV for a complete description of all services provided by Fleishman-Hillard subcontractors and the associated award amounts for these services.

Of the estimated \$8 million awarded by Fleishman-Hillard to subcontractors, the vast majority—89 percent—went to 14 subcontractors that provided campaign message promotion services. These services were designed to extend the reach and influence of the media campaign beyond the paid advertisements by using a variety of marketing techniques to publicize the media campaign’s anti-drug messages. For example, Rogers & Associates was responsible for promoting the campaign’s message by encouraging the entertainment industry to incorporate specific media campaign messages—such as the negative consequences of drug use—into television show and movie plots. Another campaign message promotion subcontractor, Campbell & Company, was responsible for using its social marketing and public health experience to conduct public outreach to the African American community—for example, developing partnerships with school and community organizations to lend credibility to and extend the reach of the media campaign.

Westat retained one subcontractor—the Annenberg School of Communication at the University of Pennsylvania (Annenberg)—for an estimated \$785,000. Although Annenberg was responsible for providing

⁸In partnership with ONDCP and the advertising contractors, The Partnership for a Drug-Free America engaged pro bono advertising agencies to create and develop the advertising concepts of the media campaign. Production companies selected by the pro bono agencies produced the actual advertisements. These production companies developed production estimates (i.e., estimates of the cost of producing the advertisement) and submitted them to MAM for review. Production of the advertisements occurred only after MAM recommended the production estimates to ONDCP for approval (and ONDCP granted approval). After producing the advertisements, the production companies submitted their invoices and cost reimbursement totals to MAM. After MAM approved the reimbursement request, Ogilvy & Mather reimbursed the production companies for the cost of producing the advertisements.

overall support to Westat with respect to the entire scope of work detailed in the prime contract, it was specifically directed to provide particular support for the following six tasks: (1) project management, (2) development of the campaign evaluation plan, (3) instrument development, (4) data analysis and report generation, (5) preparation of contract reports, and (6) modification of the campaign evaluation plan.

To determine the full range of subcontractor services, we reviewed the agreements between the prime contractors and their 102 subcontractors. From our analysis, we identified 16 distinct categories of services. Table 2 contains definitions and examples for each category.

Table 2: Services Provided by the 102 Subcontractors in Support of the Media Campaign during Fiscal Years 2002 through 2004

Service category	Subcontract tasks	Examples
Administrative reporting	<ol style="list-style-type: none"> 1. Project status reporting 2. Meeting and coordinating with other campaign partners, contributors, and prime contractors 3. Budget management and reporting 	Providing monthly summaries of spending on television, radio, and print time and space to air the media campaign advertisements
Application of behavioral science expertise	<p>Participation in the Behavioral Change Expert Panel. Specifically, the application of specialized expertise to:</p> <ol style="list-style-type: none"> 1. development of a Behavioral Brief^a 2. review and revision of ad concepts during the preliminary phase of the message creation process 3. evaluation of ad effectiveness in the post production and the post distribution phases of the campaign 	Summarizing the major findings of behavioral science research that are relevant to drug use behavior change in youth and presenting this information to the pro bono advertising agencies responsible for developing and producing the media campaign advertisements
Developing partnerships	Initiating relationships and coordinating ONDCP's anti-drug activities with professional, civic, and community associations; businesses; community anti-drug coalitions; and government organizations	Identifying and building coalitions with school and community groups and using their support to extend the reach and strengthen the influence of the media campaign
Entertainment industry outreach	Influencing popular culture by promoting campaign messages about drug abuse and addiction issues through the entertainment industry, including television, movies, music, and other forms of popular entertainment	Encouraging television shows popular among youth to incorporate specific media campaign messages—such as the negative consequences of drug use—into their plots
Meeting and event planning	Retaining experts as panelists or speakers to the public in support of ONDCP's campaign, planning special events to highlight the campaign messages, or generating event attendance through promotional work	Participating in media campaign roundtables—such as the Marijuana & Kids Media Briefings, which included discussions about the latest science on marijuana's neurological, health, and developmental effects, particularly on young people
Internet marketing	Web site development and maintenance or design and production of banner ads	Answering "Ask the Expert" questions that are submitted through and posted on theantidrug.com Web site
Management of pro bono match activity	Participation in "Pro Bono Match," which refers to the media campaign program addressing Congress' requirement that for every dollar of advertising that ONDCP spends, an equal dollar of match activity in time, space, or other in-kind contributions must be obtained. Management of pro bono match activity includes the negotiation, documentation, and tracking of all required match activity	Ensuring that media vendors (such as television stations, radio stations, or newspapers) donate free time and space to air media campaign ads in amounts equal to the time and space purchased from them with media campaign money.
Materials development and distribution	Development and dissemination of materials such as brochures, fact sheets, and posters to support ONDCP's campaign messages	Distributing instructional brochures for parents on "Keeping Your Kids Drug Free"

Service category	Subcontract tasks	Examples
Media outreach	Promoting campaign messages through broadcast media (radio, television); print media (magazines, newspapers); and display media (posters, signs), with the goal of educating the media and the public about youth drug use. This does not include buying advertising time	Researching and writing feature articles on themes such as the influence of popular culture on youth drug use or substance abuse and related public health issues for submission to magazines and newspapers
Media planning and buying	Development and execution of a strategy to buy and monitor media advertising time and space designed to deliver maximum reach, frequency, and effectiveness of the campaign at the lowest cost	Purchasing advertising media time and space strategically to target specific media campaign audiences, such as American Indian parents and youth
Multicultural community outreach	Anti-drug activities designed to ensure that ONDCP's campaign reaches targeted multicultural populations	Establishing connections within target multicultural communities for the purpose of ensuring that media campaign messages reach their intended audiences.
Qualitative research	Small-group methods such as focus groups, case studies, and the development of background information on a defined issue or problem	Researching and reporting on the potential for using humor to address drug prevention goals
Quantitative research	Surveys, content analysis, and other statistical analysis of data	Conducting a study on the prevalence and context of substance use and abuse in 150 music videos most popular among youth for the purposes of determining both the negative and positive substance-related messages to youth audiences
Stakeholder communications	Communications designed to keep stakeholders (i.e., ONDCP, PDFA, the prime contractors, and other campaign partners) abreast of developments in the campaign and to generate further involvement and support	Producing a bimonthly "Campaign Update" newsletter to be distributed to all campaign partners
Strategic input	General consultation and services given in support of the media campaign on an as-needed basis	Providing advice on how to market to target audiences, such as how to create culturally sensitive advertising that appeals to Hispanic parents
Trafficking of advertising	Physical formatting of advertising and distribution to media vendors	Ensuring that the correct advertisements (i.e., the actual film) are distributed to the television stations that are airing them

Source: GAO analysis of subcontracts.

^aThe Behavioral Brief is a background document that describes the major insights of research and literature that should be taken into account when developing advertising intended to reach youth audiences.

ONDCP's Comments and Our Evaluation

We provided a draft of this report to the Director of the Office of National Drug Control Policy for comment. In a March 14, 2005, letter, the Director commented on the draft. His written response is presented in its entirety in appendix V. In its comments, ONDCP generally agreed with our report's findings, and we incorporated its technical comments where appropriate. At the same time, ONDCP expressed some concerns about our definition of consulting services as it had done throughout our review. Specifically,

ONDCP argued that the “common use of the term” defines consultants as providing advice only, not services. As discussed with ONDCP officials throughout this review, we defined “consultants” as the prime contractors and their subcontractors that provided services, including expert advice, to implement the media campaign. Although the senate committee report that mandated our review did not define the term “consultants,” through our consultations and its previous hearings, the committee expressed concerns about the use of contractors and their subcontractors for the media campaign. We used our definition of consultants to comprehensively account for how campaign funds were being used to supplement ONDCP’s in-house capabilities regarding the advertising, public communications and outreach, and evaluation aspects of the media campaign.

ONDCP also commented on a footnote in appendix IV of this report, which cites a GAO appropriations law decision holding that ONDCP violated publicity or propaganda prohibitions and the Anti-Deficiency Act when it is used appropriated funds to produce several prepackaged news stories which failed to disclose that ONDCP produced them for video news releases (VNRs) used in the media campaign. ONDCP commented that it has not produced a VNR since well before May 19, 2004, when GAO issued its first decision, B-302710, on VNRs and prepackaged news stories. ONDCP also said that it has no further plans to produce any VNRs, stating that GAO’s guidance on prepackaged news stories provided in our Circular Letter, B-304272, February 17, 2005, is “inherently incompatible with contemporary news gathering methods, thus rendering VNRs impracticable.” However, the guidance in the Circular Letter addresses the lack of attribution in prepackaged news stories, which are only one part of VNRs. The Circular Letter advises agencies that prepackaged news stories can be utilized without violating the law, so long as there is clear disclosure to the television viewing audience that this material was prepared by or in cooperation with the government department or agency.

We are sending copies of this report to the Director, Office of National Drug Control Policy, appropriate congressional committees, and other interested parties. In addition, the report will be available at no charge on GAO's Web site at <http://www.gao.gov>. If you or your staff have any questions on this report, please call Glenn Davis on (202) 512-4301 or me on (202) 512-8777.

A handwritten signature in black ink, reading "Laurie Ekstrand". The signature is written in a cursive style with a large, sweeping flourish at the end.

Laurie E. Ekstrand, Director
Homeland Security and Justice

Appendix I: Scope and Methodology

Our review of contractor services and contract award amounts associated with the Office of National Drug Control Policy's (ONDCP) National Youth Anti-Drug Media Campaign covered fiscal years 2002 through 2004. To develop background critical to describing and evaluating key aspects of the campaign, we conducted our work at the headquarters of ONDCP, The Partnership for a Drug Free America (PDFA), and media campaign prime contractors in Washington, D.C., and New York City. We reviewed the legislation authorizing the campaign—The Drug-Free Media Campaign Act of 1998—and subsequently enacted campaign legislation, as well as reports, testimony, interagency agreements, contracts, subcontracts, invoices, and vouchers. In addition, to obtain information on the media campaign process, we interviewed officials from ONDCP and PDFA. We also interviewed officials from the four prime contractors: Ogilvy & Mather, Fleishman-Hillard, the Ad Council, and Westat. To supplement our understanding of some of the kinds of services provided by subcontractors, we also interviewed officials from three of the subcontractors. In addition, we reviewed guidelines, reports, and other background documents relevant to the media campaign process provided by the officials we interviewed. Finally, we reviewed the contracts between the prime contractors and ONDCP, which laid out the objectives, strategies, and processes of the campaign, as well as the subcontracts issued under those prime contracts. While we reviewed the contract and subcontract documents, we did not review any of the products resulting from those contracts or subcontracts to determine whether they complied with any applicable laws.

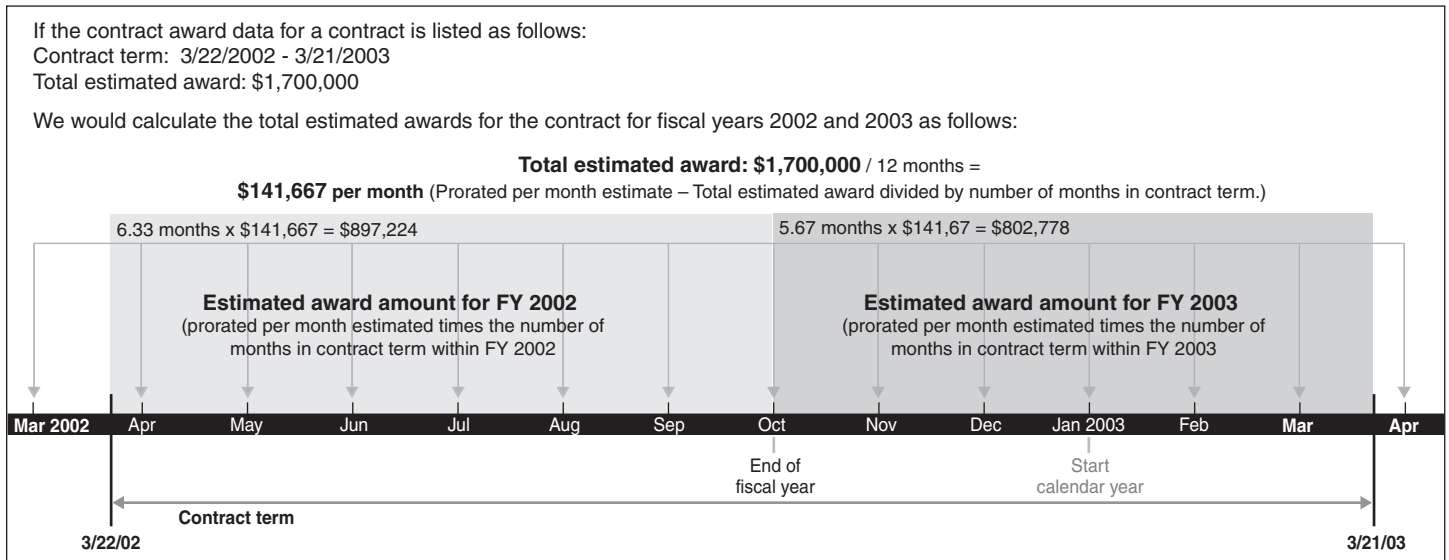
To describe the services provided by contractors and their subcontractors in support of the media campaign, we analyzed the contracts of the four prime contractors and the subcontracts of the 102 subcontractors. We obtained information about the roles and responsibilities of each of the four prime contractors from the background, scope of work, and task description sections of their respective contracts. Additionally, to describe services provided by the 102 subcontractors, we developed a data collection instrument (DCI) to allow us to analyze these services uniformly by capturing the following information: (1) the subcontract agreement date(s), (2) the prime contractor issuing the subcontract(s), and (3) what task categories captured the tasks listed in the subcontract agreement(s).¹

¹Two coders independently reviewed the subcontracts. If the coders disagreed with the coding of a particular task, they reconciled their responses before finalizing the DCI for the subcontract.

We supplemented our analysis of the prime contracts and subcontracts with information from interviews with officials from ONDCP and PDFFA and representatives from several prime contractors and subcontractors.

We estimated the amounts awarded to each of the four prime contractors based on the award data contained in their contracts and any subsequent modifications to these contracts related to awards. Each of the four prime contracts was a “cost plus fixed fee” contract, meaning that with the exception of a fixed fee, payments were disbursed in the form of reimbursements for invoiced costs. Therefore, the award amounts listed in the contract agreements were estimates of the amounts the contractors would actually receive in reimbursements. Because these estimates were constantly revised based on the status of campaign projects or other information, contract modifications were used to update the contract award data. For the purposes of this review, we used the latest contract modifications to estimate the prime contractors’ awards as they contained the most recent information. Each of these contracts covered multiple years. Awards for each year of the contract were estimated at the beginning of the contract, and those yearly estimates were modified throughout the life of the contract. The year time frames established by the contracts (with the exception of the Westat contract) did not correspond to government fiscal years and differed with each contractor. For example, Ogilvy & Mather’s contract year was from January to January and Fleishman-Hillard’s contract year was from December to December. In order to estimate the prime contractors’ award amounts by fiscal year, it was necessary to prorate the award data listed in the contracts and modifications. By prorating the award data, we obtained estimated award data for each month and were then able to calculate estimated award amounts by fiscal year. An example of this type of calculation appears below.

Figure 3: Example of Award-Based Data Calculation



Source: GAO.

Note: Numbers may not add due to rounding.

The major limitation of this method of analysis is that it assumes an equal distribution of the total estimated award over the term of the contract, which may not reflect the actual schedule of reimbursements to the contractor. Another limitation of our analysis is that it relies on estimates of the actual costs (i.e., estimated award amounts). We decided to use estimated award data instead of the expenditure data provided by ONDCP because the expenditure data were not complete.

We estimated the amounts awarded to each of the 102 subcontractors based on the award data contained in their subcontracts and modifications to these subcontracts. In 18 cases where subcontract award data were insufficient, we used invoices and vouchers provided by the prime contractors to estimate expenditure data. Subcontract award data were determined to be insufficient if (1) the subcontract did not contain any estimated award data or (2) the subcontract listed a rate of compensation for services but did not specify a maximum term or compensation.

We classified the award data contained in the subcontracts of the 102 subcontractors into five types: (1) cost-reimbursable, (2) cost plus fixed fee, (3) indefinite quantity/indefinite delivery, (4) firm fixed price, and (5) rate-based. We analyzed each type of award data differently to produce

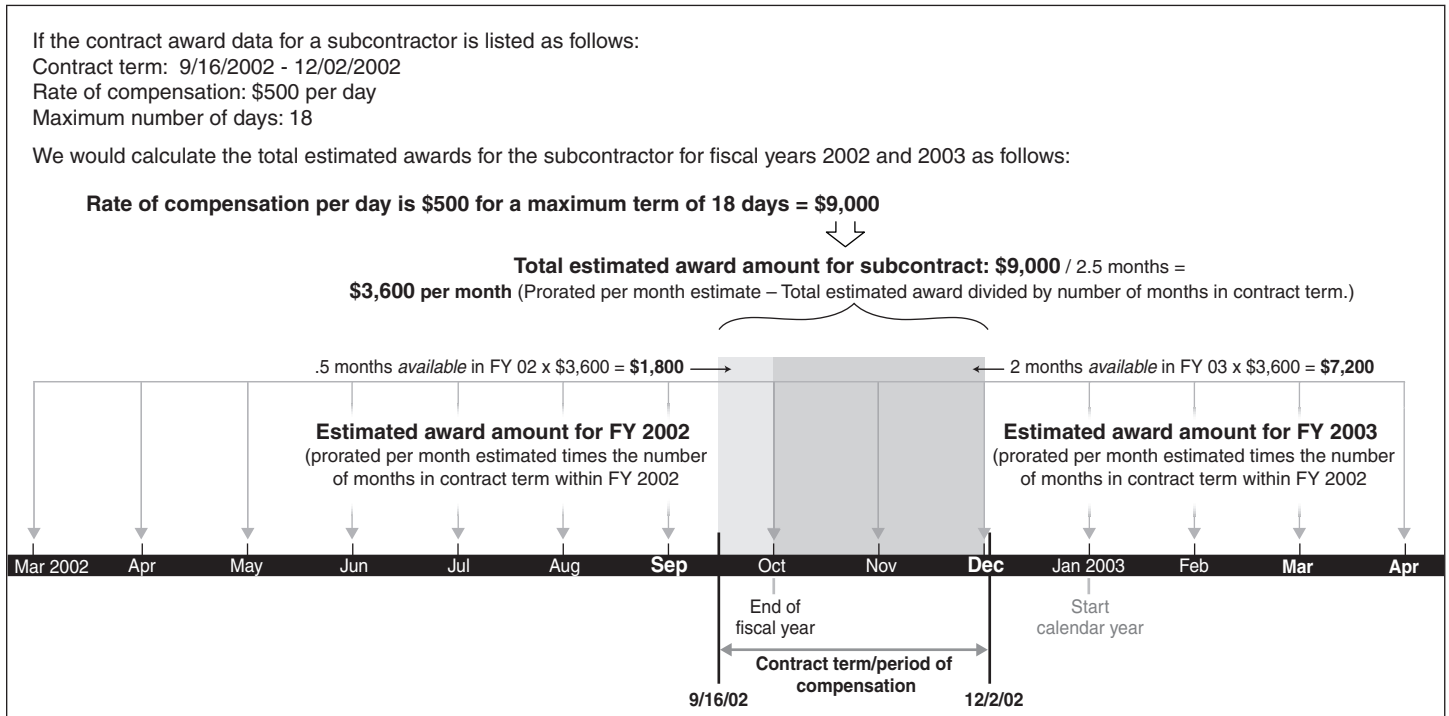
estimated award data for the 102 subcontractors for fiscal years 2002 through 2004. We analyzed the subcontracts containing cost-reimbursable, cost plus fixed fee, and indefinite quantity/indefinite delivery award data using the same method used to analyze the prime contractor award data.

We analyzed the subcontracts containing firm fixed price award data using the prorating method described above only if the term of the subcontract covered multiple fiscal years. Many of these subcontracts had terms that fell completely within a single fiscal year, in which case we assigned the total award amount listed in the subcontract to the appropriate fiscal year. Firm fixed price subcontracts are agreements in which the subcontractor receives a fixed amount for the services it provides. Regardless of the time the subcontractor requires to complete its assigned tasks or whether the subcontractor incurs additional unexpected costs in the completion of its assigned tasks, it will not receive any additional funds without a subsequent modification to the subcontract. Consequently, the award data contained in the firm fixed price subcontracts represents the actual amount the subcontractor should have received.²

We analyzed subcontracts containing rate-based awards in a two-step process to produce estimated awards by fiscal year. Subcontracts containing rate-based data contain (1) a rate of compensation for the subcontractor (for example, \$200 per hour), (2) a maximum term (such as 10 hours) or maximum compensation (such as \$2,000), and (3) a term or period of performance (i.e. the period of time during which the subcontractor will provide its service, such as between June 1, 2002, and June 30, 2002). We calculated the maximum possible award by multiplying the rate of compensation by the maximum term (unless the subcontract specified a maximum compensation). We considered this calculation of maximum possible awards as the total estimated award amounts for all rate-based subcontracts. If the term (period of performance) of the subcontract fell within a single fiscal year, then the total estimated award of the contract was assigned to the appropriate fiscal year. If the term (period of performance) of the subcontract covered multiple fiscal years, then the total estimated award was prorated as previously described, and total estimated awards for each fiscal year were calculated. An example of this type of analysis appears below.

²Because this review is not a contract audit, and we focused on the estimated awards amounts for contractors and subcontractors, we did not verify that contractors received the exact amounts listed in their firm fixed price contracts.

Figure 4: Example of Rate-Based Data Calculation



Source: GAO.

In the 18 cases where we used invoices and vouchers to estimate expenditure data because subcontract award data were insufficient, we grouped the invoices and vouchers of each subcontractor by fiscal year and totaled the invoice/voucher amounts for each fiscal year.

The methods of analysis used to produce estimated award data for subcontractors for fiscal years 2002 through 2004 have many of the same limitations as the method used to analyze the prime contract award data (i.e., much of the subcontract award data had to be prorated and some of the subcontract award data represented estimated reimbursements). In addition, we had to substitute expenditure data in the case of 18 subcontracts that did not contain sufficient award data. Consequently, we based some of our calculations related to total subcontractor estimates on different types of data (expenditure or award). We decided to use estimated award data whenever possible to ensure data consistency (i.e.,

to avoid comparing contractor awards based on estimated award data with subcontractor awards that were based on expenditure data).

We conducted our work from March 2004 through February 2005 in accordance with generally accepted government auditing standards.

Appendix II: Three Phases of Advertising Development

To develop anti-drug television, print, Internet, and radio ads, the media campaign employs a three-phase advertising development and research process. The three phases of the advertising development and research process are (1) the exploratory research phase (pre-ad creation); (2) the qualitative and quantitative research and expert review phase (during ad creation); and (3) the media planning, placement, and tracking phase (post-ad creation).

The initial exploratory phase consists of extensive research to understand the subject matter and covers many sources of information, including (1) consumer insights, (2) national studies, (3) behavioral change experts, and (4) subject matter experts. PDFA is a major source for this background research. In addition, the Behavioral Change Expert Panel (BCEP), assembled by Ogilvy & Mather, is composed of a number of individuals possessing specialized expertise relevant to specific aspects of the media campaign, such as the sociology of behavior change in youth or communicating with minority audiences. The BCEP is responsible for developing a Behavioral Brief, which is a background document that describes the major insights of research and literature to consider when developing advertising intended to reach youth audiences. The final goal of the exploratory research phase is for Ogilvy & Mather and PDFA to produce a Creative Brief for each advertising series.¹ The Creative Brief is a compilation of information provided by subject matter experts, including (1) information relevant to the specific messages of the campaign and (2) relevant portions of the qualitative research provided by PDFA regarding consumer insights and national studies. The pro bono agencies responsible for the creative development of a given advertising series use the Creative Brief and the Behavioral Brief to inform their efforts.

The second phase involves ad creation and qualitative and quantitative research. PDFA is responsible for soliciting pro bono advertising agencies that create the advertising concepts using the Creative and Behavioral Briefs. The media campaign uses multiple pro bono advertising agencies to develop advertisements. One example of a media campaign advertising series is the “Monitoring/Love” series of advertisements—a message targeting parents, promoting awareness of their children’s activities. A single pro bono ad agency developed all of the advertisements within this series. After initial advertising concepts are developed, the Formative Creative Evaluation Panel (FCEP) and the BCEP review these initial

¹An advertising series consists of three or four similarly themed advertisements.

concepts.² Next, feedback from FCEP and BCEP is used to revise the advertising concepts. Any recommendations or observations that may be relevant to future campaign efforts are to be kept for possible applications to new Creative Briefs during the initial exploratory research phase (i.e., the feedback loop in this iterative process).

Once the advertising concepts have been reviewed and revised, production estimates are calculated and reviewed for maximum cost efficiency. Once this process is completed, ONDCP is responsible for reviewing the ad concepts and approving funding for production of the advertisements. After advertisements are produced, they are submitted for copytesting, a process used to determine whether advertisements meet effectiveness standards for distribution. In the copytesting process, large sample audiences (usually consisting of 300 youths and 150 parents per copytest session) view the ads and are surveyed regarding their responses to the advertisement, drug attitudes, beliefs, and behaviors. Copytesting relies on a comparison of exposed audiences and nonexposed control audiences to determine effectiveness of advertisements. According to Ogilvy & Mather (the contractor responsible for implementing copytesting), the audience is split evenly across ethnic, gender, and age categories. One-half of the audience is exposed to the advertisement and the other half is not. Copytesting researchers then survey and compare the drug beliefs and intentions of each group to determine the effectiveness of the advertisement. If an advertisement does not meet effectiveness standards set by ONDCP, the advertisement is not aired. To successfully pass the copytesting process, an advertisement must significantly strengthen anti-drug beliefs or weaken intentions to use marijuana without creating any adverse effects. Copytesting questions are designed so that the information provided by the responses can be used to revise advertisements that fail to meet effectiveness standards.

Media planning (determining where, when, and for how long to air or print the advertisements) occurs concurrently with the advertising development and assessment process. The media plan is finalized and executed (the advertisements are distributed to media vendors) once the advertisements have successfully completed the copytesting phase and the advertisements have undergone a final review by ONDCP. After the advertisements air,

²FCEPs are evaluative discussion panels (i.e., focus groups), consisting of target audience individuals (teens or parents) who are carefully recruited and convened to review advertising concepts.

**Appendix II: Three Phases of Advertising
Development**

audience reactions are to be tracked through an evaluative process that measures the effectiveness of specific ads over time within specific audience populations.³

³This evaluative process for the individual advertisements is separate from the evaluation of the effectiveness of the media campaign as a whole (the Westat study).

Appendix III: Ogilvy & Mather's Subcontractor Services and Associated Estimated Award Amounts

During fiscal years 2002 through 2004, Ogilvy & Mather retained the services of two groups of subcontractors: (1) multicultural media planning and buying agencies and (2) substance use behavioral change experts—the Behavioral Change Expert Panel. Ogilvy & Mather awarded nearly \$5 million to its 20 subcontractors.

Multicultural Subcontractors Services and Estimated Awards

Six multicultural subcontractors provided services in support of Ogilvy & Mather's media planning, placement, and purchase responsibilities. Each multicultural subcontractor provided marketing services and strategies with regard to a specific minority audience. Each multicultural subcontractor was responsible for planning and buying media advertising time and space targeting its minority audience, managing the pro bono match activity that accompanied its media purchases, and trafficking advertising to media vendors. The multicultural subcontractors also assisted Ogilvy & Mather with its advertising creation and assessment responsibilities by providing strategic input with regard to marketing to minority audiences, particularly at the preliminary qualitative research and initial ad concept review phases.

Ogilvy & Mather awarded more than \$4 million to the multicultural subcontractors, constituting about 90 percent of the nearly \$5 million amount awarded by Ogilvy & Mather to subcontractors during fiscal years 2002 through 2004. The awards received by multicultural subcontractors covered only the cost of labor, overhead, and fees and did not include any funding specifically designated for the purchase of media advertising time and space.

Behavior Change Expert Panel Subcontractors Services and Associated Estimated Award Amounts

BCEP subcontractors mainly applied their specialized expertise to three aspects of the advertising development and research process: (1) the development of the Behavioral Brief,¹ (2) the review and revision of initial advertising concepts, and (3) the evaluation of ad effectiveness in the postproduction and postdistribution phases of the campaign. During the initial exploratory research phase, the BCEP developed the Behavioral

¹The Behavioral Brief is a background document that describes the major insights of research and literature that pro bono ad agencies should be aware of when developing advertisements intended to reach youth audiences.

**Appendix III: Ogilvy & Mather's
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Brief and contributed to the development of the Creative Brief.² The pro bono advertising agencies engaged by PDFA used the Behavioral and Creative Briefs to develop initial advertising concepts and preliminary ads. During the qualitative research and expert review portion of the ad creation phase, the BCEP reviewed the initial advertising concepts and preliminary ads and contributed to the qualitative research process by recommending improvements and revisions to the ads to foster behavior changes in the target audiences. After the final production of the ads, the BCEP worked with PDFA and Ogilvy & Mather to develop the questions used during the copytesting and postdistribution evaluation processes to determine the nature and extent of the effect of the ads on audience beliefs and intentions. At any point during the advertising development and research process, BCEP subcontractors were to provide strategic input and advice to any media campaign partner on an as-needed basis.

Ogilvy & Mather awarded less than \$500,000 to the BCEP subcontractors, constituting about 10 percent of the nearly \$5 million awarded by Ogilvy & Mather to all of its subcontractors during fiscal years 2002 through 2004.

²Creative Briefs are constructed by Ogilvy & Mather and PDFA for specific campaign messages. BCEP subcontractors are responsible for ensuring that the points listed in Creative Briefs are accurate and consistent with Behavioral Briefs.

Appendix IV: Fleishman-Hillard Subcontractor Services and Associated Estimated Award Amounts

To support its public communications and outreach efforts, Fleishman-Hillard retained the services of 80 subcontractors, which we categorized in the following 10 groups: (1) campaign message promotion, (2) photography and video production, (3) campaign message development, (4) contracting management, (5) research, (6) internet technology, (7) Marijuana & Kids Briefings panelists and speakers, (8) Library Working Group experts, (9) Asian American and Pacific Islander Marijuana Media Roundtable panelists and speakers, and (10) Teen Advisor Program experts. Fleishman-Hillard awarded about \$8 million to its 80 subcontractors.

Approximately 89 percent of the estimated \$8 million dollars that Fleishman-Hillard awarded was provided to a single category of subcontractor—those responsible for campaign message promotion. Table 3 depicts award amounts within the remaining 11 percent (about \$900,000), which was awarded to nine categories of subcontractors.

Table 3: Estimated Contract Award Amounts to Groups of Fleishman-Hillard Subcontractors by Fiscal Year (2002-2004)

Group	Number of subcontractors	2002	2003	2004	Aggregated totals
Photography and video production	11	\$28,875	\$281,199	\$34,665	\$344,739
Campaign message development	14	\$82,777	\$108,466	\$22,313	\$213,556
Contract management	1	\$61,376	\$98,972	\$13,931	\$174,279
Research	5	\$35,840	\$45,198	\$1,563	\$82,601
Internet technology	4	\$2,680	\$25,800	\$6,400	\$34,880
Marijuana & Kids briefings	12	\$2,300	\$12,700	0	\$15,000
Library Working Group meeting	5	\$5,000	0	0	\$5,000
Asian-American and Pacific Islander Marijuana Media Roundtable	10	0	\$5,000	0	\$5,000
Teen advisor program	4	0	0	\$800	\$800
Aggregated total					\$875,855

Source: GAO analysis of estimated subcontractor award amounts.

Photography and Video Production

Eleven photography and video production subcontractors provided a wide array of services, including photographing media campaign promotional events and creating audiovisual materials promoting media campaign

messages.¹ For example, one photography subcontractor was responsible for photographing the media campaign's Boston Parent Wake-Up Rally and processing the photographs for Web display and digital reproductions. Gourvitz Communications, Inc. was responsible for producing a number of videos for the media campaign, including the Marijuana Initiative Video News Release and the Marijuana Community Coalition Video.

Fleishman-Hillard awarded an estimated total of nearly \$345,000 to photography and video production subcontractors during fiscal years 2002 through 2004. Within this group, the two largest awards went to video production subcontractor Gourvitz Communications, Inc. (an estimated \$262,000) and to Court TV (an estimated \$77,000). The remaining nine awards were each for an estimated \$1,500 or less.

Campaign Message Development

Fourteen campaign message development subcontractors provided a wide array of services, including planning and implementing promotional events and researching and drafting feature articles for submission to print and online media venues. For example, one campaign message development subcontractor, Students Against Destructive Decisions, Inc. (SADD), was responsible for raising public awareness of the risks of marijuana use by planning and executing five guerrilla "Wake-Up" student rallies in which students, dressed in distinctive clothing designed by ONDCP and SADD, distributed media campaign materials in highly public urban sites during rush hour. Another campaign message development subcontractor answered "Ask the Expert" questions submitted through the media campaign's "theantidrug.com" Web site and researched and wrote feature articles on media campaign key messages that were placed on the Web site and submitted to print media venues.

¹A July 2004 congressional request asked us to examine several video news releases (VNRs) produced for the media campaign. Those releases included, among other things, several prepackaged news stories. Because those news stories did not disclose to the targeted television viewing audiences that they had been prepared at the government's behest, we determined in B-303495, Jan. 4, 2005, *Office of National Drug Control Policy—Video News Release*, and in B-303495.2, Feb. 15, 2005, *Reconsideration of B-303495—Office of National Drug Control Policy Prepackaged News Stories*, that ONDCP violated the publicity or propaganda prohibitions and the Anti-Deficiency Act when it used appropriated funds to produce those stories. GAO subsequently issued a Circular Letter, B-304272, Feb. 17, 2005, advising agencies that prepackaged news stories can be utilized without violating the law, so long as there is clear disclosure to the television viewing audience that this material was prepared by or in cooperation with the government department or agency. ONDCP commented that it ceased producing VNRs well before May 2004, and has no plans to produce any further VNRs.

Fleishman-Hillard awarded an estimated \$214,000 to campaign message-development subcontractors during fiscal years 2002 through 2004. Within this group, the four largest awards went to SADD (an estimated \$44,000), to Pride Youth Programs (an estimated \$30,000), and to two individual experts (estimated amounts of \$54,000 and \$25,500). The remaining 10 awards were each for an estimated \$14,000 or less.

Contract Management

The sole subcontractor providing contract management services was a temporary placement agency. This subcontractor provided temporary personnel staff to Fleishman-Hillard to assist with the preparation of invoices to be submitted to ONDCP regarding Fleishman-Hillard projects. Fleishman-Hillard awarded an estimated \$174,000 to this subcontractor during fiscal years 2002 through 2004.

Research

Five research subcontractors provided a wide array of services, including analyzing media campaign marketing strategies and reporting on the kinds of drug-related messages currently influencing America's youth. For example, one research contractor, MarketBridge was responsible for demonstrating and quantifying the value of corporate partnerships to the media campaign. Another research subcontractor, Mediascope, was responsible for conducting a study on the prevalence and context of substance use and abuse in the 150 most popular music videos for the purposes of identifying the negative and positive substance-related messages targeting youth audiences.

Fleishman-Hillard awarded an estimated \$83,000 to research subcontractors during fiscal years 2002 through 2004. Within this group, the largest award, an estimated \$56,000, went to MarketBridge. The remaining four awards were each for an estimated \$10,000 or less.

Internet Technology

Four Internet technology subcontractors provided a wide range of services including e-mail distribution and Web site development. For example, an Internet technology subcontractor, Experian eMarketing Services, was responsible for creating and sending e-mail messages to recipient lists created by Fleishman-Hillard, using content provided by Fleishman-Hillard. Another Internet technology subcontractor, TestPros, assessed the usability of two media campaign Web sites.

Fleishman-Hillard awarded an estimated \$35,000 to Internet technology subcontractors during fiscal years 2002 through 2004. Within this group,

the largest award, an estimated \$17,500, went to Experian eMarketing Services. The remaining three awards were each for an estimated \$11,000 or less.

Marijuana & Kids Briefings

Twelve Marijuana & Kids Briefings subcontractors served as panelists and speakers in roundtable discussions addressing the latest science on marijuana's neurological, health, and developmental effects on youth.

Fleishman-Hillard awarded an estimated \$15,000 to these subcontractors during fiscal years 2002 through 2004 to panelists and speakers for its Marijuana and Kids Briefings. All of the Marijuana & Kids Briefings' subcontractors were individual experts, rather than firms. Most of these subcontractors were paid at a daily rate of \$500, with a maximum term of service of 1 day. Within this group, the largest award went to an individual expert for an estimated \$9,000. The remaining 11 awards were each for an estimated \$1,000 or less.

Library Working Group

The purpose of the Library Working Group was to explore how librarians and other adults can help kids find accurate, high-quality information about drugs on the Internet. Five Library Working Group subcontractors provided a range of services including advising on common library and Internet issues; assisting in the development of instructional products about cyberliteracy and illicit drugs; and recommending strategies, vehicles, and partnerships to accomplish program goals.

Fleishman-Hillard awarded an estimated \$5,000 to Library Working Group subcontractors during fiscal years 2002 through 2004. All of the Library Working Group subcontractors were individual expert, rather than firms. Each of the five subcontractors received a total estimated award of \$1,000.

Asian American and Pacific Islander Marijuana Media Roundtables

Ten Asian American and Pacific Islander Marijuana Media Roundtable subcontractors served as panelists and speakers in roundtable discussions to address the latest scientific findings on marijuana's neurological, health, and developmental effects on youth.

Fleishman-Hillard awarded an estimated \$5,000 to Asian American and Pacific Islander Marijuana Media Roundtable subcontractors during fiscal years 2002 through 2004. All of the Asian American and Pacific Islander Marijuana Media Roundtable subcontractors were individual experts,

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rather than firms. Each of these subcontractors received a total estimated award of \$500.

Teen Advisor Program

Four Teen Advisor Program subcontractors were responsible for providing insight and feedback on the campaign's youth-oriented strategies in order to guide the development of teen programs, events, and Web site content.

Fleishman-Hillard awarded an estimated \$800 to Teen Advisor Program subcontractors during fiscal years 2002 through 2004. All of the Teen Advisor Program subcontractors were individual experts, rather than firms. Each of the four subcontractors received a total estimated award of \$200.

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



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

March 14, 2005

Ms. Laurie E. Ekstrand
U.S. Government Accountability Office
441 G. Street, NW
Washington, D.C. 20548

Dear Ms. Ekstrand:

The Office of National Drug Control Policy (ONDCP) has reviewed the draft GAO report entitled, "Anti-Drug Media Campaign: An Array of Services Was Provided, but Most Funds Were Committed to Buying Media Time and Space." In general, ONDCP believes that the report is accurate in its description of the complexities of the contracting, subcontracting and consulting issues. However, ONDCP believes there are several instances in which we find it necessary to respond to or clarify comments.

GAO has had difficulties attempting to develop a bright line distinction between contractors, subcontractors, and consultants, and we remain perplexed by the GAO's definition of "consulting services" to include all Media Campaign contracts (please see page 2). GAO asserts that the concern by Congress was that "...a large portion of the Campaign's budget pays for outside media and advertising consultants" and that "...the committee report directed us to review how consultants were used in support of the Media Campaign." Yet in the common use of the term, a fundamental distinction is that consultants provide opinions whereas contractors provide services. Nevertheless, we are confident that the Media Campaign's actual use of consulting services over the period of review demonstrates good judgment and stewardship of Campaign resources, and are used when necessary to access expert opinion so that this very sophisticated Campaign can be planned and implemented wisely.

As noted on page 3, this report does not reflect the fact that of the funds "awarded" to Ogilvy (noted here as \$97.0 million over the surveyed period), a significant amount (the estimate is approximately 41 percent, or \$40 million) were monies approved by ONDCP for payment out to PDFA-chosen advertising agencies and production companies for making of commercials/ads, as well as for research, measurement, tracking and monitoring of that advertising (CMR, FCEPs, Millward Brown, etc.). While the recipients of these funds were not identified as consultants or subcontractors under the GAO definitions, the funds were paid to these vendors as part of Media Campaign implementation and not retained by Ogilvy.

We do not concur with GAO's view that the Westat evaluation contract with NIDA should be treated as "...a prime contractor of the Media Campaign..." (This is noted on page 6 footnotes). While indeed ONDCP has statutory responsibility for evaluating the Campaign, this interpretation puts NIDA, the nation's premier scientific organization focusing on the drug issue, in the position of being merely a check-writing organization and not serving the purpose that

ONDCP intended and NIDA agreed to and carried out. NIDA's research expertise has been engaged since day one of the agreement and is a critical function. Had ONDCP treated NIDA as merely a pass-through organization then ONDCP would have been violating the spirit of the congressional mandate to carry out an independent evaluation. Further, it has been NIDA's ongoing responsibility to monitor the performance of the contractor and remedy any potential shortcomings by way of evaluation design, execution, or interpretation of findings.

Further, the agreements with HHS and NIJ to carry out clearinghouse services also should not be treated as prime contracts. Although review of these agreements is not included in the GAO report for appropriate reasons, it should be clear that interagency agreements, whether for purposes of carrying out the evaluation or providing clearinghouse services, involves the expertise of the recipient Federal agency and is not merely a pass-through.

Fleishman Hillard (FH) and its subcontractors are not tasked with placing anti-drug messages through the purchase of time or space. More accurately, Fleishman Hillard's task is described as promoting the anti-drug messages and information to the news and entertainment media and to appropriate organizations such as community coalitions, schools, employers and corporations. For references, note pages 9, 13, and 27.

In the description of services provided by FH on page 8, the report describes media outreach and gives the example of submitting articles to newspapers and magazines. However, a more accurate description of FH's media outreach would be their effort to secure accurate news coverage on marijuana harms to youth through media events and briefings for reporters with scientific experts. Moreover, in the table on page 9, the description Entertainment industry outreach subcontract task as "placement of campaign messages" would be more appropriately described as "promotion of campaign messages." Neither FH nor its subcontractors have the power or resources to actually "place" campaign messages in popular entertainment venues. The example given is accurate.

In the media outreach category on page 13, the word "placement of campaign messages" again overstates the resources and abilities of the Campaign's subcontractors in this category. The phrase "promotion of campaign messages" is a more accurate description. Similarly, the example given should describe the activity as articles that are "submitted" to magazines and newspapers, rather than "placed." Further, in Appendix IV on page 26, GAO has grouped a set of 14 subcontractors under the heading "Campaign Message Development." The activities of these subcontractors/consultants is better described as "Anti-drug Message Dissemination" as their tasks are generally to plan and implement events and activities that further disseminate campaign messages.

Although the nature of these fourteen subcontractors is generally well detailed on page 27, this description twice references "placement of messages", as opposed to the more appropriate description - submission of articles. Again, these subcontractors do not have the responsibility for placement of messages through purchase of media time or space.

To clarify the reference to NIDA on page 21, NIDA does not provide qualitative research to the Campaign. However, NIDA does provide review and clearance of all campaign messages, to assure that message content is scientifically accurate.

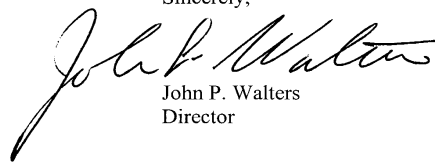
The observation is made on page 21 that the Campaign "...deliberately uses many pro bono agencies to develop advertisements to ensure variety and fresh perspectives." While that viewpoint is consistently expressed, the reality is that such potential benefits are sometimes outweighed by the challenge of working with many different ad agencies, few of whom have any background or history with preparing anti-drug ads. Given the sensitivity of the subject matter and the fact that today's teens are the most marketed to generation ever, the special expertise that theoretically is derived over time with both topic and audience is rarely achieved.

On page 22, we would like to clarify that FCEPs are not panels of experts in either drug issues or the target audiences, but rather are actual groups of target audience individuals (teens or parents) who are carefully recruited and convened to review advertising concepts. This is a critical first stage of target audience exposure to prototype messages.

ONDCP notes the referenced GAO finding on VNRs (page 27 footnote), and suggests that it be clarified to point out that the ONDCP Media Campaign has not produced a VNR since well before the GAO ruling on the HHS VNRs on May 19, 2004. Further, ONDCP believes that the GAO guidance on "prepackaged news stories" issued to federal agencies on February 17, 2005 sets forth a requirement for viewer notification which is inherently incompatible with contemporary news gathering methods, thus rendering VNRs impracticable. In any event, ONDCP has no plans to produce any further VNRs.

ONDCP appreciates this opportunity to review the draft report and to provide formal comment. Should you have any questions, please contact Christine Morden in the Office of Legislative Affairs at the Office of National Drug Control Policy.

Sincerely,



John P. Walters
Director

Appendix VI: GAO Contacts and Staff Acknowledgments

GAO Contacts

Laurie E. Ekstrand (202) 512-8777
Glenn G. Davis (202) 512-4301

Staff Acknowledgments

In addition to those named above, the following individuals contributed to this report: David Alexander, Leo Barbour, R. Rochelle Burns, Christine Davis, Wendy C. Johnson, Weldon McPhail, Jean McSween, Brenda Rabinowitz, Tami Weerasingha, Bill Woods, and Kathryn Young.

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