

SUPPORTING STATEMENT FOR OMB CLEARANCE

National Youth Anti-Drug Media Campaign

Copy Testing – Supporting Statement A

OMB Control Number
3201-0006

Prepared by:
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On behalf of:
Office of National Drug Control Policy
Executive Office of the President
750 17th St. NW
Washington, DC 20503

February 23, 2009

PAPERWORK REDUCTION ACT SUBMISSION

Please read the instructions before completing this form. For additional forms or assistance in completing this form, contact your agency's Paperwork Clearance Officer. Send two copies of this form, the collection instrument to be reviewed, the Supporting Statement, and any additional documentation to: Office of Information and Regulatory Affairs, Office of Management and Budget, Docket Library, Room 10102, 725 17th Street NW, Washington, DC 20503.

1. Agency/Subagency originating request: Office of National Drug Control Policy (ONDCP)	2. OMB control number: b. <input type="checkbox"/> None a. 3201-0006
3. Type of information collection (<i>check one</i>) a. New collection b. Revision of a currently approved collection c. Extension of a currently approved collection d. Reinstatement, without change, of a previously approved collection for which approval has expired e. Reinstatement, with change, of a previously approved collection for which approval has expired [X] f. Existing collection in use without an OMB control number <i>For b.-f., note item A2 of Supporting Statement instructions</i>	4. Type of review requested (<i>check one</i>) a. Regular [X] b. Emergency--Approval requested by: <input type="checkbox"/> c. Delegated 5. Small entities Will this information collection have a significant economic impact on a substantial number of small entities? Yes No [X] 6. Requested expiration date a. Three years from approval date [X] b. <input type="checkbox"/> Other--Specify: ____/____/____
7. Title [National Youth Anti-Drug Media Campaign (NYADMC)-Adult and Youth Copy Testing	
8. Agency form number(s) (<i>if applicable</i>)	
9. Keywords Drug Abuse Prevention, Youth, Adult, Communications	
10. Abstract This research will allow for the testing of anti-drug messages and copy for use in the NYADMC. Results will be used to select ads and messages for the campaign. Testing will be conducted among both Youth and Adult target audiences.	
11. Affected public (<i>mark primary with "P" and all others that apply with "X"</i>) a. [X] Individuals or households b. <input type="checkbox"/> Business or other for-profit c. <input type="checkbox"/> Not-for-profit institutions d. <input type="checkbox"/> Farms e. <input type="checkbox"/> Federal Government f. <input type="checkbox"/> State, Local, or Tribal govt.	12. Obligation to respond (<i>mark primary with "P" and all others that apply with "X"</i>) a. Voluntary b. Required to obtain or retain benefits c. Mandatory
13. Annual reporting and recordkeeping hour burden a. Number of respondents: [11,100 Year 1] [7,800 Years 2 & 3] b. Total annual responses: [11,100 Year 1] [7,800 Years 2 & 3] 1. Percentage of those responses collected electronically: [100%] ____ c. Total annual hours requested: [2,370 Year 1] [1,680 Years 2 & 3] ____ d. Current OMB inventory _____ e. Difference _____ f. Explanation of difference 1. Program change _____ 2. Adjustment _____	14. Annual reporting and record keeping cost burden (<i>in thousands of dollars</i>) a. Total annualized capital/startup costs: [0] _____ b. Total annual costs (O&M): [0] _____ c. Total annualized cost requested: [\$525,000 Year 1] [\$300,000 Years 2 & 3] _____ d. Current OMB inventory _____ e. Difference _____ f. Explanation of difference 1. Program change _____ 2. Adjustment _____
15. Purpose of information collection (<i>mark primary with "P" and all others that apply with "X"</i>) a. <input type="checkbox"/> Application for benefits b. <input type="checkbox"/> Program evaluation c. <input type="checkbox"/> General purpose statistics d. <input type="checkbox"/> Audit e. <input type="checkbox"/> Program planning or management f. <input type="checkbox"/> Research g. <input type="checkbox"/> Regulatory or compliance	16. Frequency of recordkeeping or reporting (<i>check all that apply</i>) a. Recordkeeping b. Third party disclosure c. Reporting [X] 1. On occasion 2. Weekly 3. Monthly 4. Quarterly [X] 5. Semi-annually 6. Annually 7. Biennially 8. Other (<i>describe</i>) _____
17. Statistical methods Does this information collection employ statistical methods?	18. Agency contact (person who can best answer questions regarding)

Yes <input checked="" type="checkbox"/> No	the content of the submission) Name: [Mark Krawczyk] Phone: [202-395-6720] _____
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SUPPORTING STATEMENT FOR OMB CLEARANCE

NATIONAL YOUTH ANTI-DRUG MEDIA CAMPAIGN

COPY TESTING

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Copy Testing of Messages for ONDCP

National Youth Anti-Drug Media Campaign Supporting Statements

A. Justification

1. Circumstances Making the Collection of Information Necessary

This submission for OMB clearance is one of three data collection instrument submissions currently up for renewal for the Office of National Drug Control Policy's (ONDCP) National Youth Anti-Drug Media Campaign. The data collection instruments are used as part of the advertising development process as required by ONDCP's 2006 Congressional Reauthorization (Public Law 109-469) that states ONDCP must "test all advertising prior to use in the national media campaign to ensure that the advertisements are effective and meet industry-accepted standards."

All data collection instruments have been developed with input from subject matter experts in the fields of advertising and public health communication research and evaluation; have been reviewed by an Institutional Review Board (IRB) to ensure the research with human subjects is scientific, ethical, and meets Federal regulatory requirements; and are currently conducted by industry leading third-party vendors, such as Millward-Brown.

The Media Campaign's success can be attributed, in part, to its ability to test all messaging to ensure that only the most effective ads are aired. Ad testing will continue to use national youth and adult samples to assess audience comprehension, reactions and perceptions. Information from testing will be used principally to select ads for national airing, and secondarily to refine ads that do not pass initial testing.

This submission is for approval for tests that will follow the methods described in Section B. Total respondent burden will not exceed 26,700 individuals and 5,730 hours over three years (refer to Section A11, Tables 1 and 2).

2. Purpose and Use of Information

Advertising developed for the National Youth Anti-Drug Media Campaign will be tested in final or "near-final" form before it will be considered for inclusion in the media plan. The main purposes of this testing procedure are to ensure that each ad is effective in communicating its intended message and that it does not have any unintended negative effects. Without such testing, the ONDCP is unable to discriminate between effective and ineffective advertisements.

Specific criteria for message evaluation is tailored to ads based on their communication objectives and target audience. Additionally, ads will be assessed for effectiveness using the following set of standard diagnostic criteria:

<u>Comprehension</u>	Is the main message clearly understood? Is the audience able to identify and recount the intended main message? Is the intended information presented in a manner that makes it effective and actionable for the intended audience?
<u>Likeability</u>	How much does the audience like the ad? Which elements do they like about the ad? Which do they dislike?
<u>Personal Relevance</u>	Do respondents perceive the message as relevant to themselves or their peers?
<u>Believability</u>	Is the message and/or its source perceived as credible? Does it portray the message realistically and convincingly?
<u>Acceptability</u>	Is there anything in the message that is perceived as offensive or unacceptable to either primary or secondary audiences? In particular, do parents have significant concerns about ads intended of youth audiences?
<u>Behavioral Intent</u>	Do respondents think they will take action as a result of seeing/hearing the message?

The information gathered on these areas will clearly identify those messages which most compellingly and effectively engage and influence intended audiences. By systematically conducting this testing, ONDCP will continue to produce messages that have the greatest potential to favorably influence attitudes and behavior and to expend program resources wisely and effectively.

3. Use of Improved Information Technology

To both facilitate ease and efficiency of responses and modernize research practices, the campaign testing process will conduct adult and youth testing over the Internet through use of online panels. In some instances place-based intercepts will be used. In those cases, computer screens are used to administer the surveys in a manner consistent with the tests conducted online.

4. Efforts to Identify Duplication and Use of Similar Information

All advertising considered by ONDCP for inclusion in the campaign is new, and for this reason testing of all messaging is required. For the transition from place-based to online test methodology, two data collection methods will be employed simultaneously in year one to understand if there are any differences in results and/or biases from the different methods. No more than two rounds of creative concepts each for youth and adults will be tested simultaneously. After the transition period, no duplicate data collection will exist.

5. Involvement of Small Entities

This research does not involve any small business or other small entities.

6. Consequences if Information is Collected Less Frequently

The frequency of information collection will be tied to the production of new advertisements for the campaign. Each new ad must be tested to assure on-air effectiveness and prevent unintended consequences. If information is collected any less frequently than proposed, ONDCP's ability to discriminate between effective and ineffective ads will be significantly impaired.

7. Consistency with the Guidelines in 5 CFR 1320.5(d)(2).

There are no special circumstances.

8. Consultation Outside Agency

The ONDCP has established a network of research, behavioral science, communications and public health experts that serve as ongoing consultants to the campaign and are known as the Media Campaign Advisory Team (MCAT). Those who will be involved with shaping the campaign research include:

Social Marketing/Behavior Change Advisors

Elvira Elek, Ph. D.	Prevention/Behavior Change/Multicultural (Hispanic) target audience specialist
Kristen Holtz, Ph.D.	Family/Parenting Dynamics/Youth Understanding/Drug Abuse Prevention
Leslie Snyder, Ph.D.	Social Marketing and Mass Communication
Lisa Ulmer, Ph.D.	Prevention and Behavior Change

Additional Core Advisors

David Brandt	Practical Advertising Research, Interpretation of Quantitative Evaluation results
Philippe Cunningham, Ph.D.	Family/Parenting Dynamics/Skills
Ivan Juzang	Multicultural Understanding/Advertising/Branding
Larry Sheier, Ph.D.	Research Methodology and Theory
Peter Zollo	Youth Understanding/Advertising/Branding

Outside Agencies

Fieldwork and recruiting will be conducted by the Marketing Workshop, Inc., a full service national marketing research company based in Norcross, Georgia, or a comparable research company. Once data is collected from desired youth and parent samples, both tabulations and raw data are turned over to Drafftcb, the advertising contractor.

9. Payment to Respondents

It is standard practice in commercial market research to offer recruited respondents some form of reimbursement for their time and effort. Respondents will receive the equivalent of \$5.00 in compensation for participating in copy testing. For online panels, the reimbursement is provided as \$5.00 in "points" given to each respondent by their online panel's proprietary reward program. Respondents can accrue and/or redeem these points for a wide variety of items such as

merchandise and gift cards for use as payment at physical and online merchants. Youth respondents recruited via place-based intercepts will be given \$5.00 cash in reimbursement for their participation.

10. Assurance of Confidentiality Provided to Respondents

Respondents are informed prior to participation that their responses will be anonymous. They will also be advised of the nature of the activity, the length of time required, and that their participation is purely voluntary. Respondents are told that no penalties will occur if they wish to not respond, either to the information collection as a whole or to any specific question.

All presentation of data in analysis and reporting is in aggregate form with no links to individuals being preserved. Reporting is used only by project staff for purposes of ad selection. Although some personal information is collected (e.g., gender, race, age), no personal identifiers (e.g., full name, address or phone, social security number, etc.) will be collected or maintained. Thus, the Privacy Act does not apply to the proposal activities.

11. Questions of a Sensitive Nature

By virtue of the focus on drug use, there will be some sensitive questions for respondents. These specifically relate to the items required to identify those respondents at risk for drug abuse. Respondents will be asked about their intentions to use drugs and their beliefs about drug usage as they pertain to the message in the ad being shown.

12. Estimates of Annualized Burden Hours and Cost

Youth ads are tested in a test/control method. Each youth ad test will include a total of 300 respondents (150 teens; 150 tweens) in the test condition and 300 respondents (150 teens; 150 tweens) in the control condition. As multiple ads are tested at the same time, for youth we estimate that 12 ad (test) and 4 control conditions will be used per year.

For adult testing, the Campaign uses a test/control method for some advertising while other advertising is tested using a general communications check. Adult ads in test/control will be tested with a total of 150 respondents in the test condition and 150 respondents in the control condition. We estimate that 6 ad (test) and 3 control conditions will be used per year. For adult ads in general communications check tests, each ad will be tested with 300 respondents; we estimate that 5 ad (general) conditions will be used per year.

The Annualized Response Burden table below provides the maximum annual distribution of respondents and hours. Time to read, view, or listen to the message being tested is built into the 'hours per response' figures.

Table 1. Annualized Response Burden

Audience	Conditions	Number of Respondents	Responses per Respondent	Hours per Response	Total Hours	Hourly Wage	Respondent Cost
Youth (test)	12	3,600	1	.25	900	\$6.55	\$5,895.00
Youth (control)	4	1,200	1	.10	120	\$6.55	\$786.00
Adult (test)	6	900	1	.25	225	\$14.96 ¹	\$3,366.00
Adult (control)	3	450	1	.10	45	\$14.96 ¹	\$673.20
Adult (general)	5	1,500	1	.25	375	\$14.96 ¹	\$5,610.00
TOTAL	-	7,650	-	-	1,680	-	\$16,330.20

¹Extrapolation based upon 2006 per capita income, 2006 Current Population Survey, U.S. Census Bureau, U.S. Department of Commerce

For the transition from place-based to online test methodology, both methods will be employed simultaneously to understand if there are any differences in results and/or biases from the different data collection methods. No more than two rounds of creative concepts each for each Youth and Adults will be tested simultaneously. As such, the table below provides the additional response burden during the transition, which will take place in year one.

Table 2. Additional Response Burden Year One

Audience	Conditions	Number of Respondents	Responses per Respondent	Hours per Response	Total Hours	Hourly Wage	Respondent Cost
Youth (test)	6	1,800	1	.25	450	\$6.55	\$2,947.50
Youth (control)	2	600	1	.10	60	\$6.55	\$393.00
Adult (test)	4	600	1	.25	150	\$14.96 ²	\$2,244.00
Adult (control)	2	300	1	.10	30	\$14.96 ²	\$448.80
TOTAL		3,300	-	-	690	-	\$6,033.30

²Average income based on Census 2000 median individual income estimates of \$28,269 for males and \$16,188 for females.

13. Estimate of Respondent Capital and Maintenance Cost

There are no respondent costs beyond those indicated in 11 above.

14. Estimates of Annualized Cost to the Federal Government

Based upon the estimated groups per year in Section A.12., the annualized costs to the federal government are:

- In the first year, when both place-based and online tests will be used simultaneously, the estimated costs to the government will be no more than \$525,000.
- In years 2 & 3, when only online-testing will be used, the estimated costs to the government will be no more than \$300,000 per year.

15. Program Changes/Changes in Hour Burden

At the onset of the campaign research in 1998, respondent burden was comparably larger (estimated 27,995 respondents vs. 7,650 respondents at present). Ongoing campaign findings have led to refinement of the target sampled, resulting in cost efficiencies. Since 2005, there has been a decrease in the impact of hour burden estimates.

16. Time Schedule, Publication and Analysis Plans

While the primary purpose of these studies will be to select ads for the national media buy, the ONDCP may make results available to its partners, including ad agencies working to develop new ads and/or refine messages that test poorly. General conclusions about effective messages derived from tests across multiple ads may also be drawn and shared with national, state and local organizations working to prevent youth drug use.

Advertising is tested as it is developed, at an average rate of no more than three ads per quarter. The typical time frame for testing each ad will be no more than three weeks from the receipt of the ad to final reporting on its test results. The data collection plan, schedule and analysis for each project will be tailored to the specific message and intended audience. Examples of the core data collection are provided in the surveys the Attachment section. Analytic techniques used are a combination of qualitative and quantitative approaches (e.g., qualitative aggregation and assessment of open-ended responses as well as statistical analysis of quantitative survey data).

17. Expiration Date Display Exemption

The OMB Control Number and expiration date will be included in all applicable respondent materials.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

This activity will fully comply with the Certification for Paperwork Reduction Act submissions.