### SUPPORTING STATEMENT FOR OMB CLEARANCE

# National Youth Anti-Drug Media Campaign Tracking Study – Supporting Statement A

OMB Control Number 3201-0010

Prepared by: **Draftfcb** 100 West 33<sup>rd</sup> Street New York, New York 10001

On behalf of:

Office of National Drug Control Policy
Executive Office of the President
750 17<sup>th</sup> St. NW
Washington, DC 20503

August 24December 14, 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, 775 17th Street NW Washington DC 20503

725 17th Street NW, Washington, DC 20503.					
<ol> <li>Agency/Subagency originating request:         Office of National Drug Control Policy (ONDCP)     </li> </ol>	2. OMB control number: b. None a. 3201 –0010				
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	4. Type of review requested ( <i>check one</i> ) a. Regular [X] b. EmergencyApproval requested by: c. Delegated				
<ul> <li>d. Reinstatement, without change, of a previously approved collection for which approval has expired</li> <li>e. Reinstatement, with change, of a previously approved collection for which approval has expired [X]</li> <li>f. Existing collection in use without an OMB control number</li> </ul>	5. Small entities Will this information collection have a significant economic impact on a substantial number of small entities? Yes No [X]				
For b f., note item A2 of Supporting Statement instructions	6. Requested expiration date a. Three years from approval date [X] b. OtherSpecify:/				
7. Title [National Youth Anti-Drug Media Campaign (NYADMC)-Parent and Yo	uth Tracking]				
8. Agency form number(s) (if applicable)					
9. Keywords <b>Drug Abuse Prevention, Youth, Parents, Communications</b>					
	ast the theoretical model, ensuring that the advertising is efficiently and effectively, the data captured in the tracking study will be used to monitor the impact of the				
11. Affected public (mark primary with "P" and all others that apply with "X") a. [X] Individuals or households d Farms b Business or other for-profit e Federal Government c Not-for-profit institutions f 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: [15,920 Year 1] [14,000 Years 2 & 3] b. Total annual responses: [15,920 Year 1] [14,000 Years 2 & 3] 1. Percentage of those responses collected electronically: [100%] c. Total annual hours requested: [3,980 Year 1] [3,500 Years 2 & 3] d. Current OMB inventory e. Difference f. Explanation of difference 1. Program change 2. Adjustment	14. Annual reporting and recordkeeping cost burden (in thousands of dollars)  a. Total annualized capital/startup costs: [0]  b. Total annual costs (O&M): [727,500]  c. Total annualized cost requested: [727,500]  d. Current OMB inventory  e. Difference  f. Explanation of difference  1. Program change  2. Adjustment				
15. Purpose of information collection (mark primary with "P" and all others that apply with "X")  a Application for benefits e P Program planning or management c General purpose statistics d Audit g Regulatory or compliance	16. Frequency of recordkeeping or reporting (check all that apply)  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 (describe)				
17. Statistical methods  Does this information collection employ statistical methods?  Yes [X] No	18. Agency contact (person who can best answer questions regarding the content of the submission)  Name: [Mark Krawczyk]  Phone: [202-395-6720]				

#### SUPPORTING STATEMENT FOR OMB CLEARANCE

#### NATIONAL YOUTH ANTI-DRUG MEDIA CAMPAIGN

#### TRACKING STUDY

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#### 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 third-party vendors, such as Millward-Brown.

The ONDCP's tracking study has become an indispensable tool in providing guidance for Campaign messaging and media strategies. Results from this study will continue to provide the intelligence necessary to ensure the ongoing success of the National Youth Anti-Drug Media Campaign.

#### 2. Purpose and Use of the Information

The National Youth Anti-Drug Media Campaign (the Campaign) is a social marketing effort designed to prevent and reduce youth illicit drug use by:

- Increasing awareness of the consequences of drug use
- Changing youth and adult attitudes and intentions to use drugs
- Using parenting skills to prevent youth from using drugs
- Motivating youth and adults to adopt and maintain anti-drug behaviors

Since the Campaign was initiated in 1999, a tracking study has provided information resulting in the continuous improvement of Campaign strategies and tactics. These tracking studies are not used as a formal evaluation of the Campaign. The Campaign Ttracking studies are utilized to allow for more flexible analysis of data. As a result, various components of the Campaign (i.e.e.g., specific spending levels, media vehicles, Campaign strategies) can be accurately modeled using various techniques.

#### Continuous data collection allows for:

- Monitoring the on-air (TV) performance of individual ads, ad Campaigns and related PSAs relative to ad awareness goals.
- Monitoring the awareness of print and Internet ads/banners and other material such as brochures and posters.

To fulfill the Campaign objectives of decreasing illicit drug usage among youth, a logic model based on the theory of planned behavior has been deployed. The role of advertising is to:

- 1. Raise Awareness: Adults and youth see, hear and comprehend anti-drug advertising messages.
- 2. <u>Change Attitudes:</u> After viewing the advertising, adults and youth evaluate the validity of its factual information, its social implications, and whether they believe they can effectively carry out the behaviors necessary to prevent youth/themselves from using drugs.
- 3. <u>Change Intentions</u>: Once adults and youth deem the anti-drug messages as valid, they adopt anti-drug attitudes and make a personal commitment to engage in simple anti-drug actions, or assume a drug-free lifestyle.
- 4. <u>Change Behavior</u>: Once adults and youth have committed to anti-drug behavior, they begin to adopt prevention behaviors featured in advertising, devise their own strategies and promote the behavior among peers.

To help ensure that the advertising is efficiently and effectively creating awareness, and changing attitudes, intentions and behaviors, tracking studies measure for advertising message delivery against the above model. Surveys measure overall awareness of anti-drug advertising, as well as the recognition of specific TV, print and online executions. The teen tracking study measures youths' beliefs, attitudes, and their intention to use marijuana, other drugs and alcohol. The parent tracking survey measures parent's beliefs about the relation between parenting and children's drug use, as well as their intention to monitor their child(ren), an effective means of parent efficacy in reducing the likelihood of children's drug use. Supplemental tracking studies (e.g. anti-methamphetamine ad awareness tracking) may be used to measure specific beliefs, attitudes and intentions regarding drug abuse.

Ultimately, the data captured in the tracking studies will be used to monitor the impact of the the relationship between advertising on and beliefs and intentions. Ongoing tracking will also allow ONDCP to modify measures to reflect changes in strategy and the introduction of new advertising.

#### 3. Use of Information Technology and Burden Reduction

To facilitate-modernize research practices in accordance with advertising industry practices, the campaign tracking

study will change from mall-based surveys (teens) and <u>computer-aided telephone interviewing random-digit dialing</u> (adults) to online methodology over the next year. The surveys will be conducted through use of online panels.

#### 4. Efforts to Identify Duplication and Use of Similar Information

The tracking studies described here are the sole source of continuous target information relative to the effective use of media, the optimization of Campaign messaging platforms and the overall strategic direction of the Campaign. For the transition from mall-based and <u>computer-aided telephone interviewing random-digit dialing</u> to online methodology, two data collection methods may be employed simultaneously for a period of up to 8 weeks to understand if there are any differences in results/biases from the different methods. After the transition period, no duplicate data collection will exist.

#### 5. Impact On Small Businesses or Other Small Entities

The proposed research does not involve any small businesses or other small entities.

#### 6. Consequences of Collecting the Information Less Frequently

To be able to effectively change attitudes, perceptions and behaviors about marijuana and other illicit drugs, the Campaign uses a wide variety of media (print, television, radio, interactive), a range of message strategies and numerous specific advertisements throughout the course of the year. Ongoing data collection is necessary to be sensitive to changes in advertising and media strategies and to demonstrate their impact on Campaign objectives. In addition, tracking studies provide the ability to assess the wear-out of specific advertising messages as well as the impact of seasonality on the Campaign. Media buying strategies cannot be effectively optimized without such information.

#### 7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances.

#### 8. Comments in Response to the Federal Register Notice and Efforts to Consult 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

#### Ad Hoc Advisory Pool

In addition to MCAT, a pool of ad hoc advisors may participate in working groups and in special consultation on specific issues or topics. These ad hoc advisors have expertise in the range of areas described above, as well as specialized expertise in such areas as: approaches to advertising research, peer networks, mass culture, emerging media and technology, new drug threats (such as methamphetamine and abuse of prescription medications), and advertising and branding. The ad hoc advisors will supplement the MCAT as needed.

#### Other Agencies & Vendors

Fieldwork and recruiting are currently conducted by third party vendors (e.g. Millward Brown, a full service international marketing research company specializing in tracking studies). Once data is collected from desired youth and adult samples, both tabulations and raw data are turned over to Draftfcb and Initiative Media, the advertising contractor and sub-contractor, for data analysis on a quarterly basis and as-needed.

#### 9. Explanation of Any Payment or Gift 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. 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. For the transition period, youth respondents recruited via mall-based intercepts will be given up to \$5.00 cash in reimbursement for their participation, and adults recruited and surveyed by phone are not offered incentives to participate.

#### 10. Assurance of Confidentiality Provided to Respondents

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

As a further guarantee of anonymity, all presentation of data in reports will be in aggregate form, with no links to individuals being preserved. Although some personal information will be gathered (e.g. gender, age, race) 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. Justification for Sensitive Questions

By virtue of the focus on drug use, there will be sensitive questions for respondents. These specifically relate to the items inquiring about respondent attitudes about marijuana and other illicit drugs as well as their intentions to use marijuana. These questions are necessary to determine the impact of recalled advertising on the attitudes and behaviors that the Campaign is intended to change. To protect the individual from any negative response to these questions or any fear of discovery, several steps are taken to provide necessary assurances.

First, respondents are informed that their answers are recorded anonymously. Second, they will be informed that they need not answer any question that makes them feel uncomfortable or which they simply do not wish to answer.

Thus, there will be no linkage of disclosure of illicit behavior to any individual.

#### 12. Estimates of hour burden including annualized hourly costs

Over the course of one year of tracking, the total hour burden is estimated at 3,500 hours as follows:

Table 1. Estimates of Annual Burden by Hours and Annualized Cost to Respondents

				Annual	Hourly	
	Number of	Frequ-	Avg. Time Per	Burden	Wage	
Audience	Respondents	ency	Response	(Hours)	Rate	Annual Cost
Teens (11-18)	7,000	1	15 minutes	1,750	* \$6.55	\$11,462.50
Adults	7,000	1	15 minutes	1,750	** \$14.96	\$26,180.00
TOTAL	14,000	-	-	3,500		\$37,642.50

For the transition from place-based and random-digitcomputer-aided telephone interview-dialing to online test methodology, both methods will be employed simultaneously for up to 8 weeks in the first year to understand if there are any differences in results and/or biases from the different data collection methods. As such, the table below provides the additional response burden during the transition, which will take place in year one.

Table 2. Estimates of Additional Burden by Hours and Annualized Cost to Respondents for Transition Period (Year One)

	-			Annual	Hourly	
	Number of	Frequ-	Avg. Time Per	Burden	Wage	
Audience	Respondents	ency	Response	(Hours)	Rate	Annual Cost
Teens (11-18)	1,120	1	15 minutes	280	* \$6.55	\$1,834.00
Adults	800	1	15 minutes	200	** \$14.96	\$2,992.00
TOTAL	1,920	-	-	480		\$4,826.00

<sup>\* 2000</sup> Child Labor Coalition- Current Population Survey: 26% of all 16 year-olds are employed in an average month. As a conservative estimate for this application, 50 % employment at minimum wage is assumed.

#### 13. Estimate of Other Total Annual Cost Burden to Respondents or Record Keepers

There is no additional cost burden to respondents or record keepers.

#### 14. Annualized Cost to the Federal Government

The maximum annual cost for conducting Campaign tracking studies is \$727,500.

#### 15. Explanation for Program Changes or Adjustments

Ongoing Campaign findings, along with target refinements (addition of meth tracking and sampling different teen segments by age) and inflation have resulted in a cost increase.

#### 16. Plans for Tabulation and Publication and Project Time Schedule

While the primary purpose of the tracking study is to both guide media planning and to monitor strategic messaging effectiveness (changes in beliefs and intentions), the ONDCP may make results available to its partners.

The data collection plan, schedule and analysis for each project will be tailored to the specific message and intended audience. While data collection takes place on a continuous basis, reporting of analytic modeling results is done largely on a quarterly basis. Awareness levels for individual ads/campaigns are monitored on a more frequent basis to identify any on-air issues that need to be addressed more immediately.

#### 17. Expiration Date Display Exemption

<sup>\*\* 2006</sup> per capita income, *Money Income in the United States*, 2006 Current Population Survey, U.S. Census Bureau, U.S. Department of Commerce

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 submission complies with all requirements contained in 5 CFR 1320.9 and 5 CFR 1320.8(b)(3).