

December 28, 2008

Via Electronic Mail

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Office of National Drug Control Policy
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**RE: FR Doc. E8-26553; Paperwork Reduction Act; Notice of Intent To Collect;
Comment Request; 73 Fed. Reg. 66276, November 7, 2008**

Dear Sir:

This letter is responsive to the Office of National Drug Control Policy's (ONDCP) "Notice of Intent to Collect" for comments on the National Youth Anti-Drug Media Campaign (hereinafter "NYADMC") in the November 7, 2008 issue of the Federal Register (FR Doc. E8-26553, filed 11-6-08; 8:45 a.m.). The Notice specifically seeks comments regarding "Ways to enhance information quality, utility, and clarity of the collection instruments..."

Issues of Interest to the Marijuana Policy Project

Following are comments related to: (1) the validity of the "Tracking Study" (OMB 3201-0010) and "Copytesting" (OMB 3201-0006) methodologies; (2) "ways to ease the burden on respondents, including the use of automated collection techniques or other forms of information technology;" and (3) the NYADMC's focus on teen marijuana use.

1. Data on Which NYADMC is Evaluated is Unreliable

The ONDCP's "Tracking Study" and "Copytesting" methodologies are both self-report measures, which MPP, along with a host of social scientists, views as highly problematic¹.

All self-report measures have a low internal validity and are, at best, correlation research². This creates a problem for ONDCP evaluation methodology, specifically with regard to the "Tracking Study," in that causation cannot be shown. MPP questions the validity of showing results for a media campaign based on a methodology that cannot show

¹ Paulhaus, D.L. "Measurement and control of response bias." *Measures of social psychological attitudes* 1 (1991): 17-59.

² Spector, P.E., and M.T. Brannick. "The nature and effects of method variance in organizational research." *International Review of Industrial and Organizational Psychology* 10(1995): 249-74.

a direct causal link between the campaign and the public attitudes it seeks to influence. While the “Tracking Study” may be useful for determining public attitudes toward drugs in general, it does not measure the media campaign’s effectiveness.

Further, many researchers find self-report measures largely suspect because, as they argue, a confirmation or response bias is often observed³. It has been shown that when using this methodology, the data are more likely to reflect the participants’ pre-existing values than their reactions to the object of study.⁴ This is of particular importance for the “Copytesting” instrument.

At a minimum, these self-report measures should be validated by other methodologies (e.g. direct behavioral or IAT) in order to improve the validity of the ONDCP’s approach.

2. Return to the Westat Analysis Methodology

Another option for improving ONDCP methodology would be a return to the evaluations conducted previously by the Annenberg School for Communication and Westat, which correlated exposure to the ads and recall of messages contained therein with changes in attitudes and intentions regarding drug use. These instruments provided a much stronger indication of the ads’ actual effect than the three instruments currently in use by the ONDCP. The fact that these independent evaluations were discontinued after they showed little apparent benefit from the ads ONDCP produced from 2000 to 2004 caused many to doubt the integrity of ONDCP’s evaluation process.

3. ONDCP Should Employ Automated Collection Techniques to Broaden the Range of Comments and Reaction to Proposed Advertising Campaigns

In response to the “Special Issues for Comment” (b), the ONDCP might consider the use of informal methodologies for measuring the success of the media campaign. Online polls, comments, and discussion forums would provide the ONDCP with opportunities to seek feedback from large numbers of people with minimal investment. Making any formal assessments with these measures is difficult, if not impossible. However, they can be very valuable for cultivating ideas, roughly gauging reactions, and quickly spotting any problems that may have been overlooked during pre-broadcast vetting.

4. The ONDCP NYADMC’s Near-exclusive Focus on Marijuana is Premised on a Fallacious Conclusion of Cause-and-Effect (The “Gateway Theory”)

Finally, it’s important to note that the central goal of the ONDCP NYADMC – the reduction of drug use in America – is inadequately addressed by the campaign’s focus on teen marijuana use. This errant focus is based on the “gateway theory” which, though shown

³ Matthews, Gerald, and Moshe Zeidner. *Emotional Intelligence: Science and Myth*. 1st ed. Boston: MIT Press, 2004.

⁴ Hanita, M. "Self-report measures of patient utility: should we trust them?" *Journal of Clinical Epidemiology* 53(2000): 469-476.

to be false⁵, has formed the media campaign's basis for targeting teen marijuana use. The exclusion of illicit substances like methamphetamine or heroin, as well as abuse of prescription drugs, is the major flaw with all extant ONDCP methodologies, in that the more dangerous substances are precluded from examination.

Sincerely,

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⁵ R. Levitt, E. Nason, and M. Hallsworth, "Technical Report: The Evidence Base for the Classification of Drugs," RAND Corporation, 2006.