

United States General Accounting Office

Report to the U.S. House of Representatives  
on the Effectiveness of the  
Department of Justice's  
Drug Abuse Prevention  
Programs

DRUG ABUSE  
PREVENTION

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United States  
General Accounting Office  
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Program Evaluation and  
Methodology Division

B-242520

August 22, 1991

The Honorable Major R. Owens  
Chairman, Subcommittee on Select Education  
Committee on Education and Labor  
House of Representatives

NCJRS

SEP 19 1995

ACQUISITION

Dear Mr. Chairman:

At your request, we examined the policies and methods used by the Department of Education and the Department of Health and Human Services to award federal recognition to drug abuse prevention programs. Our report contains recommendations to the Secretary of Education and the Secretary of Health and Human Services for the improvement of their recognition efforts.

As we agreed with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the date of this letter. At that time, we will send copies to interested parties and make copies available to others upon request.

If you have any questions or would like additional information, please call me at (202) 275-1854 or Robert York, Acting Director of Program Evaluation in Human Services Areas, at (202) 275-5885. Other major contributors to this report are listed in appendix IV.

Sincerely yours,

Eleanor Chelimsky  
Assistant Comptroller General

# Executive Summary

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## Purpose

Over 90 percent of adolescents try alcohol and 47 percent try marijuana sometime before graduating from high school. Further, as many as one third of adults report using illicit drugs in their lifetime. Interested in federal efforts that aim to focus national attention on exemplary drug abuse prevention programs and provide successful models for others to emulate, the Chairman of the House Subcommittee on Select Education asked GAO to evaluate the methods used by federal agencies to identify exemplary drug abuse prevention programs. Specifically, GAO examined the policies and procedures of two recognition efforts during their 1989-90 award cycles.

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## Background

In 1987, two systematic federal recognition efforts were established. The Department of Education's Drug-Free School Recognition Program was set up to review school programs for youth (at a cost of \$961,000 for the 1989-90 cycle); the Department of Health and Human Services (HHS), through its Office for Substance Abuse Prevention (OSAP), inaugurated its Exemplary Program Study to review programs for any age group (at a cost of \$36,599 for the 1989-90 cycle). Procedurally, both agencies solicited nominations through state agencies and private organizations, required written applications, and used nonfederal reviewers to evaluate applications according to specified sets of criteria. The Department of Education methodology also included site visits to programs initially rated highly. Federal officials in each case made the final recognition decisions.

The policies underlying both recognition efforts limited eligible programs to those with a "no-use" approach to drug abuse prevention for youths. In the strictest sense, no-use programs are those with a consistent message that any use of drugs, alcohol, or tobacco is always wrong and harmful. Responsible-use approaches, on the other hand, while not condoning the use of drugs, alcohol, or tobacco, may attempt to prevent or delay the onset of substance use by stressing informed decision making, or may aim to reduce the riskiest forms of use (such as drinking and driving) and encourage reduction in use for those who are already involved in tobacco, alcohol, and drug use. Current research evidence has not demonstrated the general superiority of one prevention approach over any other, nor have any evaluations isolated the effects of a no-use approach. Further, responsible-use approaches are widespread, as shown by the continued presence of Students Against Driving Drunk (SADD) chapters in 25,000 middle and high schools.

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## Results in Brief

GAO found that the Department of Education and HHS unnecessarily limited the search for successful drug abuse prevention programs by considering only those with a no-use approach. GAO believes that until it has been established that a particular approach works best in preventing drug use, it is unreasonable for federal recognition efforts to preclude the examination of many promising strategies.

Second, GAO found four procedural weaknesses in both recognition efforts: (1) nomination procedures were not sufficiently comprehensive or systematic to allow inclusion of all eligible programs; (2) application criteria were not clearly defined; (3) evidence of effectiveness was not required; and (4) reviewer panels did not include individuals with the methodological skills to pursue or critique effectiveness evidence. Further, the HHS Exemplary Program Study did not conduct site visits to validate and supplement the evidence provided in written applications, and did not provide sufficient time to read applications. Finally, with regard to the Drug-Free School Recognition Program, GAO found that the recommendations of its review teams were subject to further review by a less well-informed steering committee.

GAO concluded that the search for effective drug abuse prevention programs will be most effective, and public confidence in the results of these federal recognition efforts will be greatest, if their policies are broadened to permit review of any type of promising program and their procedures are revised to increase the emphasis on evidence of effectiveness.

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## Principal Findings

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### Underlying Policies

Both recognition efforts considered only those programs with a no-use approach towards drug abuse prevention, despite a lack of evidence demonstrating the superiority of this approach over others. Since neither recognition effort is governed by specific statutes, however, the agencies have the discretion to set limits on their recognition efforts. GAO also found that, in addition to considering only general no-use approaches, the Department of Education also appeared to give preference to a set of specific prevention strategies (such as resistance skills training, self-esteem enhancement, and in-school curricula in general) that, while among those with promise, are not the only ones supported by the literature (which, for example, also cites peer programs and

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alternatives programs). GAO believes, however, that until evaluation has shown that one strategy is clearly superior to another, the long-range objective of finding ways to reduce drug use will be better served—and sooner achieved—by considering a wider range of possible approaches to drug prevention.

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## Procedures

First, programs could only be nominated for recognition by specific state agencies or designated organizations. Though these agencies and organizations serve a useful role in voluntarily shouldering the screening tasks, their procedures are neither systematic nor comprehensive. Some programs that may be important potential models, but that are not well known to a designated nominator, may never be encouraged to enter the application process. The risk is that strong programs may be excluded from recognition consideration.

Second, the dimensions on which applications were appraised had not been clearly defined, and GAO observed examples of multiple interpretations of the same data, as evidenced by the assignment of disparate weights to the dimensions. This risks both excluding strong programs from recognition and including weak ones.

Third, and most important, GAO found that the current recognition processes did not determine whether the recognized programs work. Despite eligibility criteria stating that programs must be effective, results were not specifically requested, and GAO saw few that had been provided. Programs may have plausible designs and elements that hold the promise of achieving reductions in drug use; however, where demonstration of effectiveness is a criterion for eligibility, it is not clear that national recognition should be awarded on promise alone.

Fourth, GAO found that neither recognition effort tried to enlist review team members with methodological or research expertise. These teams were therefore not likely to require effectiveness evaluations from applicants, and thus the recognition effort was not likely to produce strong data on the effectiveness of these programs. Yet the lack of these data is one of the chief impediments to making progress towards identifying effective strategies for preventing drug abuse.

Fifth, a strength of the Department of Education procedures was that multiple data sources were used, including site visits that provided validation and additional important information (especially concerning the extent to which programs were actually implemented, as well as the

extent to which they met the application standards). However, operating with a much smaller budget, the HHS Exemplary Program Study did not conduct site visits of the top applications. Without the additional data provided by site visits, reviewers in the Exemplary Program Study risk either excluding strong programs or recommending weak ones for recognition.

Sixth, in the Drug-Free School Recognition Program, the reviewers' recommendations were further reviewed by a nonfederal steering committee whose purpose was not clear. This group lacked any additional information, yet their final recommendations overturned 10 of the earlier reviewers' results—and, in all but one of these cases, they did so without consulting the reviewers.

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## Recommendations

GAO recommends that the Secretary of Education and the Secretary of HHS remove limitations that prevent consideration and evaluation of a wider variety of prevention strategies, conduct a more systematic and comprehensive search for programs that could merit recognition, clarify application criteria, require data demonstrating programs' effectiveness, and supplement existing review panels and teams with individuals having backgrounds that allow skillful critique of effectiveness evidence. GAO also recommends that the Secretary of Education eliminate the steering committee's veto power over recommendations and that the Secretary of HHS add site visits to the data collection procedures and expand the work schedule to allow all reviewers sufficient time to assess applications.

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## Agency Comments

GAO requested comments from the Department of Education and HHS. There were no factual errors requiring correction. While both Departments agreed with many of GAO's recommendations and cited plans to strengthen some procedures in their recognition efforts, both reiterated their policy positions to consider only programs that require a no-use approach for youths because, in their opinions, any other approach would be inconsistent with existing laws. GAO recognizes that drug and alcohol use by minors is illegal. However, it is GAO's conclusion that there are no laws mandating either recognition effort and that existing laws do not rule out responsible-use approaches that convey the message that drug and alcohol use is wrong and harmful, but that are also designed to reduce, and ultimately eliminate, those behaviors by youths who nevertheless choose to engage in them. GAO therefore makes no change in its recommendation that the policy should be broadened.

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**Abbreviations**

ADAMHA	Alcohol, Drug Abuse, and Mental Health Administration
CAPE	Council for American Private Education
GAO	General Accounting Office
HHS	Department of Health and Human Services
NASADAD	National Association of State Alcohol and Drug Abuse Directors
NFP	National Federation of Parents for Drug-Free Youth
NPN	National Prevention Network
OSAP	Office for Substance Abuse Prevention
SADD	Students Against Driving Drunk

# Introduction

The most recent data from the High School Senior Survey show that over 90 percent of young adolescents have tried alcohol and 47 percent have used marijuana sometime before graduating from high school. Further, according to the National Household Survey on Drug Abuse, over half of the adults aged 18 to 25 and one third of those 26 and older reported illicit drug use sometime in their lives. The percentage of the U.S. population who have tried drugs has remained relatively constant over the past 15 years. To deal with the problem of drug use, federal funding has risen from \$2.7 billion in fiscal year 1986 to \$10.6 billion in fiscal year 1991. As reported drug use figures have continued to remain high, funds have expanded and drug abuse prevention programs have proliferated, despite the lack of knowledge concerning what strategies are most effective. To focus national attention on exemplary efforts in drug abuse prevention, provide models of success for others to emulate, and possibly stimulate development of new models, two federal agencies began offering recognition awards to drug abuse prevention programs.

The Department of Education established its Drug-Free School Recognition Program in 1987, honoring a total of 128 schools to date. Also in 1987, the Office for Substance Abuse Prevention (OSAP) in the Department of Health and Human Services (HHS) began a similar effort, in collaboration with the National Association of State Alcohol and Drug Abuse Directors (NASADAD), called the Exemplary Program Study. This OSAP effort has so far recognized 50 substance abuse prevention programs of all kinds that serve various age and population groups. Table 1.1 shows the history of the two federal recognition efforts.

**Table 1.1: Federal Drug-Abuse Recognition Efforts**

Federal recognition effort	1987-88	1988-89	1989-90
<b>Drug-Free School Recognition Program</b>			
Applications submitted	238	223	261
Program sites visited	105	105	123
Programs recognized	30	47	51
<b>Exemplary Program Study</b>			
Applications submitted	50	90	69
Finalists	50 <sup>a</sup>	<sup>b</sup>	30
Programs recognized	20	20	10

<sup>a</sup>In the first year, all applications were sent to the panel for review.

<sup>b</sup>NASADAD officials do not have records of the specific number of applications that were considered finalists. However, they reported that the top 20 to 40 percent were reviewed by the panel.

Awarding federal recognition to drug abuse prevention programs on a sound basis is an important and difficult task. A great many public and private agencies can benefit from good information on what works in the perplexing area of drug abuse prevention. Experts in the field and federal agency officials may have notions about what works best and preferences for various theoretical and practical aspects of such programs. However, real solutions to the nation's drug problem will come faster when evaluation of effectiveness becomes the main test for action, funding, and recognition. A recognition effort based on reliable evaluation of the objectives and results of promising models can both give publicity to program designs based on evidence rather than guesswork and suggest the usefulness at all levels of strong program evaluation. Iterative evaluations that are done as part of recognition efforts can identify objectives that proved unattainable, as well as program approaches that were unsuccessful. Both then can be discarded and funds reallocated.

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## Objectives, Scope, and Methodology

In view of the importance and difficulty of the enterprise, the Chairman of the House Subcommittee on Select Education asked us to evaluate the current methods used by federal agencies to identify exemplary drug abuse prevention programs. In response to this request, we reviewed 1989-90 activities and results of the two federal recognition efforts. Our objectives were to describe and assess the policies and procedures of these federal efforts in order to reach conclusions about the likelihood of their reaching sound recognition decisions.

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## Methodology for Describing the Recognition Efforts

To understand the policies that underlie the recognition efforts and the complete set of procedures by which these recognition efforts made their selections, we used a number of means of data collection. First, we obtained written documents, including manuals, training materials, and memoranda describing the procedures. We also examined lists of nonfederal reviewers and documentation on how they were selected. We reviewed written procedures for the site visits conducted by the Drug-Free School Recognition Program. We observed initial planning meetings and subsequent selection deliberations for the Exemplary Program Study; however, Department of Education officials did not permit us to observe working sessions or site visits of the Drug-Free School Recognition Program.

We interviewed federal agency officials at the Department of Education and officials of NASADAD, which, under the direction of OSAP, administers

the OSAP recognition effort. We also reviewed in detail six applications submitted to each recognition effort, with three each being randomly selected from among those winning recognition and those not. In each case, we reviewed the application, examined all review documentation (such as score sheets and site visit reports), and interviewed an official from the program that submitted the application. We interviewed 8 nonfederal reviewers—4 from each of the two recognition efforts—who were those most familiar with the applications we had selected. For the Drug-Free School Recognition Program, we also interviewed two members of a separate steering committee, made up of nonfederal individuals, that has oversight responsibility for the program.

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### Methodology for Assessing the Recognition Efforts

Using specific standards, we assessed two major elements in each of the recognition efforts: (1) underlying policy and (2) the appraisal process. Policy reflects the agencies' discretion to set reasonable boundaries on any recognition effort, while the appraisal process can be assessed against general standards of quality for any evaluation.

We focused on key policies reflecting the preferred prevention approaches of the sponsoring agencies. Concerning assessment of the appraisal process, after reviewing the entire recognition cycle in both efforts, we selected for review five factors that comprised the key steps: (1) the nomination phase, (2) the criteria used in reviewing the applications, (3) the data obtained on the applicants, (4) the participating reviewers, and (5) the final recommendation procedures. Details of our approach to both the policy and process elements are set forth in the following section of our report.

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### Assessing Underlying Policies

We reviewed key policies that reflected the views of the sponsoring agencies on preferable drug abuse prevention approaches and thus set limits on the kinds of programs that could be recognized. As neither recognition effort is governed by an authorizing statute or regulations, the agencies have broad discretion to set such limits.<sup>1</sup> We gathered data on the underlying policies by interviewing officials and by reviewing application materials, guidance provided to reviewers, scoring and other review documents, and source materials cited by agency officials.

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<sup>1</sup>The Department of Education effort currently is supported, in part, by funds appropriated for discretionary federal activities under a section of the Drug-Free Schools and Communities Act.

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We also reviewed the scientific literature on drug prevention (discussed in appendix I) in order to determine whether it contained adequately conclusive findings to provide a test of the agencies' policy preferences. That is, if the literature identified particular approaches as highly successful, we could then judge the reasonableness of the agencies' policies by whether they permitted or prohibited the recognition of the proven approaches. To identify the literature, we searched computer data bases, contacted experts, and collected reviews, including meta-analyses that systematically aggregate numerous separate evaluations.

In general, we found that evaluations of drug abuse prevention efforts have identified a number of strategies that appear to hold promise and others that appear generally less successful. Research has consistently failed to demonstrate that single interventions of any kind (including knowledge approaches, self-esteem programs, and curricula) are effective. There is broad support for comprehensive approaches that combine several interventions simultaneously or that include the school, parent, media, police, and so on. While no particular approach has been found consistently successful, those that hold the most promise are peer approaches and alternatives programs, as well as programs that teach communication, decision-making, and self-assertion skills.

How to educate youths about alcohol and drugs is a controversial issue given the diverse views held by parents and educators and the inconclusive evidence of the effectiveness of any particular approach or program. Accordingly, design of a recognition effort brings up issues about which there is as yet no agreement among either parents or educators.

Since drug, alcohol, and tobacco use by youths are illegal and harmful, many people plausibly believe that educators should stress absolute prohibition of use, both as school policy and as the content of instruction—hence, the “no-use” approaches. “Responsible-use” approaches, on the other hand, attempt to prevent or delay the onset of drug use, often stressing informed decision making and aiming to reduce the riskiest forms of use, such as drinking and driving. Further, for those who already use tobacco, alcohol, or drugs, these approaches may attempt to encourage more responsible use as the first step in a sequential effort to first reduce and then eliminate all use. Responsible-use approaches, however, do not condone the use of drugs, alcohol, or tobacco.

The literature has not yet demonstrated that any particular approach is consistently more effective than any other approach; thus, many

hypotheses—of educators, parents, or agency officials—remain plausible. Accordingly, we believe that agencies will better serve (and more easily achieve) the long-range objective of finding ways to reduce drug use by considering a wide range of possible approaches to drug abuse prevention. We therefore addressed the question of whether either explicit or implicit limits are necessary or useful in a recognition effort.

## Assessing the Appraisal Process

We also reviewed the appraisal process because it is the foundation of the claim of worthiness for those local efforts that are recognized, no matter what limitations are placed by policy on the breadth of search for success. The stronger the appraisal and decision procedures in a recognition effort, and the more they focus on results, the more useful is the set of recognized programs to the public and interested professionals seeking models of effective practice. Weaknesses in these procedures threaten sound decisions and can lead to two kinds of error. Type I errors are made when an effective program is not awarded recognition, thus creating a situation that is inequitable and damaging to the search for effective models. Type II errors are made when a program that is not effective is awarded recognition, which could result in misleading information being conveyed to the public and could result, for example, in funds being spent for ineffective programs if those incorrectly receiving recognition are widely replicated.

We selected for review five factors of the appraisal process that comprised all the major steps, and then looked for evidence that the recognition efforts conducted a rigorous evaluation of programs. That is, we believed that in a policy area such as drug abuse prevention, which is characterized by uncertainty, a recognition appraisal process should

- conduct a systematic and comprehensive search for applications from all relevant programs,
- evaluate applications on dimensions or criteria that are clearly defined,
- gather valid data (including evidence of effectiveness) on the criteria and fully exploit those data,
- assemble application review teams or panels that collectively have the necessary methodological and substantive skills to evaluate the applications, and
- forward the final recommendations of the most well-informed reviewers to agency officials.

For each of the five procedural factors, we established standards to guide our analysis. Most of these standards, such as the openness of a

nomination procedure, can be present to a greater or lesser degree. Some, such as whether recognized programs show effectiveness evidence, are either present or not. We chose the standards based on our judgment of important qualities that a credible recognition effort should exhibit. We selected them by examining several sets of standards of good evaluation practice and applying them to the particular situation of evaluations for recognition decisions.<sup>2</sup> We know of no other formal evaluation of recognition efforts in education or drug abuse prevention. Our combined approach, however, which includes attention to both underlying policy and procedural steps, is parallel in many ways to recommendations in an earlier review of school recognition efforts.<sup>3</sup>

Thus, our approach, which is summarized in table 1.2, was to gather data on how the two recognition efforts performed on the five procedural factors of nominations, application criteria, data, reviewers, and decisions. Details of our approach to the five are contained in the following sections of our report.

Table 1.2: Standards and Data Used in GAO Analysis of Recognition Appraisals

Factor analyzed	Major standards	GAO data sources
Nominations	Comprehensive and systematic search	Documents and interviews
Application criteria	Stated clearly to allow fair evaluation	Documents, interviews, and observations
Data	Full use of multiple sources Include effectiveness evidence	Documents, interviews, and observations Documents, interviews, and observations
Reviewers	Possess necessary skills	Documents and interviews
Decisions	Made by the most well-informed reviewers	Documents, interviews, and observations

<sup>2</sup>See the Joint Committee on Standards for Educational Evaluation, *Standards for Evaluations of Educational Programs, Projects, and Materials* (New York: McGraw-Hill Book Company, 1981); Evaluation Research Society Standards Committee, "Evaluation Research Society Standards for Program Evaluation," in P. Rossi (ed.), *New Directions For Program Evaluation: Standards for Evaluation Practice* (San Francisco: Jossey-Bass, 1982); U. S. General Accounting Office, *Assessing Social Program Impact Evaluations: A Checklist Approach*, GAO/PAD-79-2 (Washington, D.C.: October 1978); U. S. General Accounting Office, *Government Auditing Standards* (Washington, D.C.: 1988).

<sup>3</sup>See Edward A. Wynne (ed.), *Designating Winners: Using Evaluation in School Recognition Programs*, Report No. 279 (Los Angeles, Calif.: Center for the Study of Evaluation, University of California, Los Angeles, 1988). After reviewing state, local, and Department of Education efforts, authors in this symposium commented on the need for such efforts to include underlying policies that are "basically defensible to the audience concerned," as well as open nominations, clear criteria, and both outcome and process data.

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## Nominations

For the same reasons outlined in the foregoing discussion on how we reviewed recognition programs' policies—that is, the general need for a wide and systematic search for what works—we also looked specifically for systematic and comprehensive nomination procedures. Limitations imposed at the earliest stage of the search for candidates for recognition are unfair as well as damaging to the goal of finding what works among the widest range of activities, guiding philosophies, service populations, and geographic areas. A comprehensive nominations process is not meant to imply that there should not be a mechanism for screening out inappropriate applications or limiting the numbers of applications in order to control the burden on nonfederal reviewers, as well as on agency staff. Rather, a systematic and comprehensive nomination process allows all interested programs to apply for nomination, regardless of any prior connection to the nominator. Thus, if certain types of programs were being systematically excluded because a nominator was not familiar with them, a more public procedure might bring to the agencies different types of programs than they would be aware of otherwise. Although in our review of the two efforts we found few documents outlining nomination procedures that must be followed, we gathered data on the nomination procedures by interviewing Department officials, applicants, and reviewers.

## Application Criteria

Application review criteria must be clearly defined so that reviewers can efficiently and fairly evaluate applications on these dimensions. Not only must the definitions be clear, the guidelines for assigning different scores for each criterion must also be clear. We studied the criteria by interviewing Department officials, steering committee members, and application reviewers; by examining applications, reviews of applications, notes from site visits, and evaluations of reviewers; and by observing meetings of reviewers.

## Data

Valid data should be obtained on the application criteria and used as the basis for recommending recognition. In this way, decisions for recognition can be based on the strongest evidence possible. First, evidence for the recognition recommendation is stronger when it is drawn from multiple sources. Observations of programs and interviews with program staff and clients through site visits as supplements to a written application would serve this goal. Second, reviewers should have adequate time to review all available evidence.

Third, evidence should be obtained not only on what the programs do but also on how effective they have been, especially since the eligibility criteria of both recognition efforts state that programs must have

demonstrated effectiveness. While some programs may have plausible designs and elements that have the promise of achieving reductions in drug use, it is questionable whether national recognition should be awarded on promise alone.

We recognize that the evaluation of prevention programs poses many difficulties—for example, identifying comparison groups; demonstrating the absence of a behavior such as drug use which, without intervention, would not be evident for many years; and obtaining reliable data on an illegal behavior. Nevertheless, there are many evaluation approaches that would be feasible, so we believe that our standard calling for effectiveness data is reasonable. In fact, the feasibility of such a requirement is demonstrated by the long-standing practice of the Program Effectiveness Panel of the Department of Education (originally, the Joint Dissemination Review Panel).<sup>4</sup> This panel requires sponsors of innovative educational strategies who want federal funds in order to support the dissemination of their programs to demonstrate program effectiveness.

While sophisticated evaluation designs may be beyond the expertise and the abilities of many drug abuse prevention programs, and while the data that could be submitted may be premature, weak, or not convincing, there are still a sufficient number of available research designs that could be used by applicants. Further, because the goals of programs will vary, the appropriate outcomes will also vary. Thus, there is not one single outcome that all programs should be expected to adhere to. Applicants need not be required to demonstrate statistically significant differences in outcomes between those in a program and others, or before and after the program. Changes in outcome measures, even though not statistically significant, may be considered adequate support for recognition. Finally, reviewers should be expected to weigh the progress of programs against the importance of the goals. That is, they would have to make distinctions between programs that show 20 percent success on major goals versus those that show 40 percent success on minor goals. Regardless of the research design, outcome measure, or statistical strength of the evidence of effectiveness, what is most important is that applicants state their effectiveness criteria and report evidence of progress on those criteria.

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<sup>4</sup>The panel currently reviews programs that document their results with data drawn from a variety of evaluation approaches, ranging from quantitative experimental designs to more qualitative designs. See Office of Educational Research and Improvement, Questions and Answers About the Program Effectiveness Panel in the U.S. Department of Education (Washington, D.C.: 1988).

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To examine the types of data available, their quality, and their use, we examined applications, the reviews of the applications, reviewers' evaluations of the procedures, and documents describing recognition effort procedures; we also interviewed Department officials and reviewers, and we observed meetings of reviewers.

### Reviewers

Those selected to rate programs should possess the necessary background to judge them, especially knowledge of drug abuse prevention efforts of the past, and the skills needed to judge effectiveness from outcome evidence. Review teams or panels should include individuals familiar with the areas of drug abuse prevention, youth development, and research methodology. While individual reviewers need not possess all of these skills, the larger group should have representatives with each of these diverse backgrounds. Since we found few formal records kept on reviewers, we interviewed recognition officials in order to determine the qualifications they sought and how individuals were selected.

### Decisions

The recommendation to award or withhold recognition should be made by the most knowledgeable reviewers. Agency officials will make the final decisions, but the prior steps in which nonfederal reviewers make their recommendations will be most effective when they are taken by those most familiar with the evidence. To understand the role of evidence and other factors in the process, we reviewed procedural documents, interviewed agency officials and nonfederal reviewers, and observed reviewers' deliberations in one of the two recognition efforts. (We were precluded from doing so in the other.)

### Data Analysis

Using the multiple data sources just described, we analyzed the two programs' performances on these five procedural steps, noting the presence or absence (or degree of presence) of major elements. We did not make quantitative assessments but rather reached conclusions from the body of evidence, including the participants' views, the written record, and our own observations. We identified the types of error (type I, type II, or both) that could result from the various weaknesses and have highlighted in our conclusions those weaknesses most likely to lead to inappropriate recognition.

Our work was performed in accordance with generally accepted government auditing standards.

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## Study Strengths and Limitations

The primary strength of our study is that we used multiple sources of data to understand and document the procedures used in the recognition efforts. A general limitation of our design is that we could not, because of resource constraints, perform an independent evaluation of a sample of programs to check the agencies' data or conclusions directly. Thus, our conclusions address the broad likelihood of incorrect decisions, not the specific probability. One limitation of our data is that we were prohibited from observing team discussions and site visits in the Drug-Free School Recognition Program (though we interviewed participants in each). Our observation of the panel meeting for the Exemplary Program Study was informative, and a similar opportunity with the Drug-Free School Recognition Program would have been useful in showing how the nonfederal reviewers arrived at their recognition recommendations.

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## Agency Comments

The Department of Education and HHS provided written comments on a draft of this report. These comments are presented and evaluated in chapter 4 and in appendixes II and III.

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## Organization of the Report

Chapter 2 describes the Department of Education Drug-Free School Recognition Program procedures, and assesses the major underlying policy and the five procedural factors we examined. Chapter 3 describes and evaluates, in the same manner, the OSAP Exemplary Program Study. Finally, chapter 4 summarizes the study findings, draws overall conclusions, and provides recommendations to the agencies.

# Drug-Free School Recognition Program

The goals of the Department of Education's Drug-Free School Recognition Program were to focus national attention on exemplary school-based prevention programs; demonstrate, by example, that drug-free schools can be achieved and maintained by communities that strive for them; and offer models of success that may be adapted by other school systems.

This chapter includes a description of how the Department made recognition decisions in the 1989-90 review cycle and results of our assessment of both underlying policies and specific procedures.

## Procedures of the Drug-Free School Recognition Program

The Department of Education assigned 4 full-time staff to manage the Drug-Free School Recognition Program and also used the advice of a 12-member steering committee of nonfederal individuals to modify the program each year. In 1989-90, the Department spent \$961,000 on the Drug-Free School Recognition Program.<sup>1</sup> School programs were first nominated for inclusion in the recognition effort and then completed a detailed application. Applications were evaluated by panels of nonfederal reviewers who also conducted site visits to the top nominations. These panels subsequently used the information in the application and from the site visits to make recommendations to the steering committee and the Secretary concerning recognition awards. The procedures used in the Drug-Free School Recognition Program closely paralleled those the Department uses in several other recognition efforts, such as those for exemplary schools and teachers. Table 2.1 shows the main procedures, which are described in more detail in the sections that follow.

**Table 2.1: Main Procedures and Timetable of the Drug-Free School Recognition Program**

Procedure	Timetable
Eligible programs are nominated and submit applications	December
Review team decides for or against site visit	January
Subgroups of review panels visit programs	January to March
Review team decides for or against recognition	April
Steering committee reviews teams' recommendations	April
Secretary of Education makes final decisions based on steering committee recommendations	April

Source: Department of Education

<sup>1</sup>This included \$157,000 for Department of Education staff, \$355,000 for 123 site visits, and \$361,000 for meetings of the reviewers and steering committee. Reviewers and steering committee members receive a \$100 per day honorarium for site visits and meetings.

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## Program Development

In developing the Drug-Free School Recognition Program in 1986-87, the Department of Education staff director for the recognition effort examined the OSAP Exemplary Program Study and the Department of Education School Recognition Program. In addition, a steering committee assisted in design development. The forms used by applicants have been revised each year, based on evaluations by the reviewers and school principals. The application criteria were developed by Department of Education staff and approved by the steering committee and the Secretary.

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## Nomination Process

The recognition cycle began each year in the fall when the Department solicited nominations of public and private schools through state departments of education, the Council for American Private Education (CAPE), and the National Federation of Parents for Drug-Free Youth (NFP). There was no requirement that nominated programs receive federal funds. Each state had a limit on the number of nominations it could make (ranging from 3 to 18, depending on the number of congressional districts it contained; CAPE and NFP had limits of 50 and 102, respectively—with the NFP total based on 2 nominations for each of the states and the District of Columbia). The Department of Education had no formal guidance for the states and the organizations on how broadly the recognition opportunity should be announced or how to make selections if more programs applied than could be nominated. Department officials reported that they instructed states and others that, to be eligible for nomination, programs must have been in place long enough to produce evidence that demonstrated either prevention or a significant decrease in incidence of students' alcohol, tobacco, or other drug use. However, no documentation of that evidence was required. The Department received 261 nominations during the 1989-90 cycle. This represented an increase of 38 over the previous year's nomination total.

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## Application Procedures

The application form consisted of three parts designed to solicit detailed descriptive information on why and how an applicant's school drug program was developed and to capture its established processes, policies, and procedures.<sup>2</sup> The entire application could not exceed 17 pages. The applicant first provided demographic information about the school and the school district. The applicant also supplied a narrative description of

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<sup>2</sup>The Department of Education refers to this document as the nomination form. However, the narrative section of the nomination form is completed by the school, not the nominator. We therefore refer to it as an application form.

the school, the community served, and the antidrug program itself. Finally, the applicant described the school's program along seven dimensions that subsequently became the focus of the evaluation and scoring process. The nomination package included, for each dimension, a set of questions that an applicant must answer in this part of the narrative. These seven dimensions were referred to in the package as "indicators of success" and had weights ranging from 10 to 20 points each, for a total of 100 points. The dimensions and their maximum point values are listed in table 2.2.

**Table 2.2: The Drug-Free School Recognition Program Application Dimensions**

Dimension	Description	Maximum point value
Recognizing and assessing the problem	Determining the extent and character of alcohol, tobacco, and other drug use, possession, and distribution, and establishing a means of monitoring regularly any changes in the foregoing behavior	10 points
Setting, implementing, and enforcing policy	Establishing clear and specific rules regarding alcohol, tobacco, and other drug use, possession, and distribution that include strong corrective actions; educating entire staff, certified and noncertified, regarding their roles and responsibilities under the established policies; enforcing established policies fairly and consistently, and implementing measures to eliminate drugs on school premises and at all school-related functions	20 points
Teaching drug abuse prevention	Implementing a comprehensive "no-use" drug abuse prevention curriculum from kindergarten through grade 12 that teaches why drug use is wrong and harmful to self and others while supporting and strengthening resistance to drugs	15 points
Staff development	Mandating ongoing training for administrators, teachers, and staff that provides them with accurate up-to-date information, thereby enabling them to identify drug-related problems and determine appropriate responses	10 points
Student involvement	Implementing activities that encourage students' active participation in promoting an environment free of alcohol, tobacco, and other drug use	15 points
Parent involvement	Promoting collaboration between parents and school, encouraging parents to take an active interest in their children's behavior, and providing the guidance and support needed to resist alcohol, tobacco, and other drug use	15 points
Community involvement	Reaching out to the community for support and assistance in making the school's antidrug policy and program work; developing collaborative arrangements in which school personnel, school boards, law enforcement officers, treatment organizations, and private groups can work together to provide necessary resources	15 points

Source: Department of Education

### Application Criteria

The most important of the seven dimensions, by weight, was school policy on alcohol, tobacco, and drug use. Schools must have had rules strictly prohibiting use, possession, or distribution at school or any school-related function, and "strong corrective actions" for those breaking the rules. The application criterion concerning what was taught was also strongly weighted, and emphasized that teaching and

curriculum should also embody a no-use message—that is, that no drug or alcohol use at any age should be tolerated.<sup>3</sup>

Thus, although the seven areas highlighted in the application were general—for example, recognizing and assessing the problem, teaching drug abuse prevention, and so on—the application requirements and questions communicated to applicants specific substantive views on how these seven areas should be manifested in any school that merited recognition, and also on their relative importance. Department of Education officials told us these views were drawn from other Department publications that were developed with the assistance of advisory panels and school principals.<sup>4</sup>

## Selection and Training of Reviewers

Applications were evaluated by nonfederal individuals, including, in 1989-90, 68 program reviewers/site visitors and 12 members of the national steering committee. Half of the reviewers served in previous years; 9 of the steering committee members had served since the program's start in 1987. There were no written guidelines for soliciting participants; however, Department of Education officials stated that candidates for both groups must have had experience in school administration, teaching, parenting, law enforcement, or community coordination. Evaluation experience was not required. In addition, there was no formal announcement of the opportunity to serve as a reviewer. Resumes were screened first by the Department and then by the steering committee to determine eligibility and eliminate previous reviewers who, according to Department officials, did not perform up to Department of Education standards.<sup>5</sup> From a larger pool of names forwarded by the steering committee, the Secretary made the final selection of steering committee members and reviewers. According to the recognition effort staff, there were no formal criteria for selection other than the previously mentioned backgrounds.

<sup>3</sup>The Drug-Free Schools and Communities Act, under which this effort is funded, includes a requirement that materials produced with funds authorized by any of its sections include "the message that illicit drug use is wrong and harmful." While the act, in our opinion, does not mandate a strict no-use approach, Department of Education officials told us that they nevertheless consider that the act requires them to adopt a general policy limiting the scope of their recognition program to programs with a no-use philosophy and approach.

<sup>4</sup>See, for example, U.S. Department of Education, What Works: Schools Without Drugs (Washington, D.C.: 1989) and U.S. Department of Education, Drug Prevention Curricula: A Guide to Selection and Implementation (Washington, D.C.: 1988).

<sup>5</sup>In the past, the Department of Education has decided not to invite reviewers back for reasons such as inappropriate conduct during site visits, failure to attend and/or fully participate in all review meetings, or failure to conduct the number of site visits agreed to.

The steering committee functions included annually reviewing the guidelines for an exemplary drug-free school, assisting in the development of the application form, developing the rules and guidelines for site visitors, orienting the site visitors, and making final recommendations concerning recognition selections.

Reviewers worked in teams of five members consisting of one parent, two educators, one community representative, and one law enforcement official. Each team was chaired by an experienced reviewer selected by the Department of Education. These teams met twice in each year's cycle, once in January to review applications and again in April after conducting site visits.

Reviewers received 1 day of training before their initial 2-day stint of reviewing applications. This training included a slide presentation of the entire recognition effort process, a steering committee presentation showing the characteristics of exemplary schools and specific preferred practices reviewers should look for under each of the seven dimensions, a description of procedures for site visitors, a discussion of the forms reviewers fill out, and a walk-through of the process with a sample application. Most of the training time was devoted to a review, conducted by Department of Education staff, of the seven focal dimensions, discussion of reviewer and site visitor roles, and "red flags" visitors should look for (such as deviations in the school policy component indicated, for example, by areas in a school building where smoking is allowed or the presence of responsible-use messages in curricula). Team leaders received one extra day of training.

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## Review Procedures

The Department of Education instructed reviewers at all stages to be sure that a program showed success on each of the seven application dimensions, though no further definitions of success were provided beyond those in the application materials. Teams assigned point scores, but they were not used formally in the process; there were no required minimum scores for success. Evidence gathered in site visits was used to check the accuracy of information in the applications.

## Preliminary Review

All members of each five-member review team read all assigned applications (approximately 19 per team), discussed them as a team, and reached consensus concerning whether a school merited a site visit. For each application, the team completed a one-page form that elicited comments on overall strengths and weakness, assigned a point value for each dimension (although these were not used to select programs to be

visited), completed detailed comments for each dimension, and made a recommendation for or against a site visit.

## Site Visit Procedures

Site visits were conducted by pairs from the larger five-member teams that initially reviewed the applications. One member of each pair was required to be an educator. The site visits were intended to verify and expand upon information in the application in order to help the team reach a decision about the program's strength on each dimension. A typical site visit lasted 2 days and, according to Department of Education instructions, was to include a tour of the school; interviews with students, teachers, administrators, parents, support staff, local law enforcement officials, and community representatives; observations of informal settings before, during, and after school; observations of drug education classes; review of media coverage and publicity efforts; and a visit outside of the school to gather information on community involvement. Each site visitor was instructed to file with the Department a written report on any evidence gathered that either did or did not support the original application. The Department of Education solicited from schools evaluative comments on the visit, which were then used to help make decisions concerning whether to retain reviewers and, in extreme cases, to identify inappropriate conduct by the site visitors.<sup>6</sup>

About half of the applicants were visited—specifically, 123 of 261 programs in 1989-90 and 105 of 223 the previous year.

## Final Review

The five-member review teams met again for 2 days after the site visits to determine which programs merited recommendation for recognition. For each program, after the pair of reviewers presented the site-visit evidence, the full group of five again discussed the program and completed a one-page form of strengths and weaknesses and a form containing scores and narrative documentation for each of the seven dimensions. In addition, the team made a recommendation concerning whether the program should receive recognition. Again, the points assigned were not used to select programs for recognition. In 1989, each team reviewed about 8 or 9 programs in the 2 days available.

<sup>6</sup>In one case, during the 1989-90 cycle, a school principal commented on the antagonistic behavior of the visitors; the Department of Education discarded the data from that site visit and sent a new team of visitors to conduct a new visit. The school received recognition, although it would not have if a second visit had not been conducted. The site visitors involved in the first visit were also prohibited from visiting any other schools.

The Drug-Free School Recognition Program procedures stated that all five members of the review team must agree that a school deserves recognition in order for the team to make such a recommendation. If a team was unable to reach consensus, the application and supporting documents were submitted for final review by the steering committee.

The review process for 1989-90 took 4 months from the application deadline to the time that the reviewers made their recommendations to the steering committee. The review teams submitted 61 recommendations in 1989-90.

## Selection Process

In arriving at its final recommendations, the steering committee considered the recommendations of the review teams—eliminating from consideration any program it found lacking—and also considered the undecided cases. The committee then forwarded a slate to the Secretary for final decision. In 1989-90, the steering committee eliminated 10 of the 61 recommended programs and added none. According to Department of Education officials, the steering committee most often rejected a recommended program because it believed the no-use message was not strong enough in either the applicant's policy or curriculum.

In 1989-90, the Secretary accepted the steering committee's recommended slate of 51 programs without change. Thus, 51 of the 261 original applications (about 20 percent) received recognition as exemplary. The ratio was very similar to the previous year, when 47 of 223, or 21 percent of the applicants, received recognition. Those not selected received a letter and, upon request, a one-page feedback sheet.

## Assessment of the Underlying Policy of the Drug-Free School Recognition Program

We found, first, that the recognition effort's policy limited consideration to only part of the range of possible approaches to drug abuse prevention. Department materials, including recognition criteria, emphasized that schools at all levels should stress complete prohibition of any alcohol and tobacco use, as well as drug use. Students were the main focus of the no-use requirement. However, the Department also believes that the requirement should be applied to teachers as well, though this policy was not clearly stated in 1989-90. The 1990-91 recognition effort guidelines state clearly that no program will be considered exemplary if alcohol is used by adults on school premises or at school-sponsored events.

Such limits on the search for effective practice, while within the discretion of the agency, are not supported by the research literature, the views of educators, or even all participants in the Department's own effort. Current drug abuse prevention literature, as described in appendix I, does not conclusively support any particular approach, including either a strict no-use or, alternatively, a responsible-use one.

We also found that the materials emphasized two particular educational approaches for students, teaching them how to (1) resist peer pressure and (2) increase self-confidence. Further, in the application materials, the Department appeared to stress classroom curricula as the major ingredient of success.

### Emphasis on a No-Use Approach

The Department allowed only no-use approaches to compete for recognition, believing, first, that this was required by the authorizing legislation and, in any case, was the best approach. We do not interpret the law as restricting the recognition effort in general to no-use approaches as currently defined by the Department of Education; however, we agree that the Department has discretion to set limits on its own recognition effort. It can certainly be argued that, in the absence of evidence that no-use approaches are harmful, it is preferable to limit nominations to this set of programs, and that to allow others (such as responsible-use approaches) to compete for recognition may suggest official endorsement of their potential for success—which, in fact, the Department questions.

However, belief in other than no-use approaches is widespread, and these other approaches have not been proven harmful. We found no study comparing these alternatives, and thus there is no evidence of superiority or inferiority in either direction. In addition, we infer that many educators hold views that are contrary to the no-use position, especially concerning education on alcohol. We found, for example, that there are currently 17,000 high schools and 8,000 middle schools with chapters of a national organization called Students Against Driving Drunk (SADD). These chapters educate young people about the dangers of driving under the influence of alcohol or other drugs and encourage youths and their parents to agree on a "contract for life" that provides for a ride home without immediate recriminations for any youth away from home and unable to drive safely. However, despite their widespread use, programs allowing such a contract are unacceptable under the Department of Education's no-use philosophy.

Further, the Department's policy is not accepted by all participants in the recognition effort. For example, 2 of the 6 applicants we interviewed felt that this requirement was applied too stringently and that inflexibility in this regard, for high schools, excludes from the process programs that have strong potential for success.

Though the Department's current policy is plausible and within its discretion, the problem our nation confronts is one of widespread drug use by young people coupled with little evidence supporting any current prevention program strategy. Therefore, we believe that the goal should be a wide search for effective practice and that this goal is best served by a policy of accepting for evaluation programs of as many types as possible, while reserving recognition only for those showing evidence of effectiveness.

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### Prevention Strategies

The strength of the application materials was that they recognized the importance of comprehensive programs, as evidenced by the sections on student, parent, and community involvement. However, application materials targeted specific prevention strategies while ignoring others that hold promise of success. The materials specifically asked applicants to demonstrate how they taught young people to resist peer pressure and increase their self-confidence; no other strategies were mentioned. By naming these strategies specifically, the Department implied that these approaches were preferable to others (such as alternatives, peer approaches, and so on). This, however, is not supported by current evaluation evidence that, as demonstrated in appendix I, shows that no strategy has yet proven itself, which indicates that many different approaches still hold promise.

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### Emphasis on Curricula

Curricular strategies in general were also repeatedly emphasized in the "teaching drug abuse prevention" section of the application criteria. For example, the indicators of success listed in the application materials stressed curricula several times, thus appearing to give preference to this type of drug abuse prevention strategy. The continual references to curricula suggested to applicants that programs that exclusively use curricula to teach drug abuse prevention were acceptable, despite the fact that during the 1988-89 cycle the steering committee—recognizing the shortcomings of such narrowness—rejected schools that used classroom-based drug abuse prevention curricula as their only prevention strategy. In addition, several applicants told us that site visitors stressed the merits of packaged curricula. When we reviewed the

written record on 6 applications, we further found that, despite instructions to reviewers that comments and site visit reports should not include the names of specific curricula, curricula were named by reviewers at 3 of the 6 sites.

In contrast to such a narrow focus, appendix I shows that the drug abuse prevention literature illustrates the importance of comprehensive drug abuse prevention programming for young people (which may include curricula as one component of the comprehensive approach) and the Department of Education-advocated community involvement in youth drug abuse prevention. Further, the effectiveness of most curriculum packages is unknown. Finally, it is likely that most in-school programs have little impact since many current curriculum packages provide only a few hours of contact with students on the topic of drug abuse prevention. Nevertheless, the application materials had the appearance of embodying a policy that emphasized the greater merit of classroom-centered approaches to drug abuse prevention.

## Assessment of the Procedures of the Drug-Free School Recognition Program

We focused our procedural assessment on 5 main factors: (1) the nomination procedures, (2) the criteria used to evaluate programs, (3) the data obtained on each criterion, (4) the reviewers, and (5) the decision process. Weaknesses in 3 of the 5 factors create a strong likelihood that ineffective programs will be recognized, and weaknesses in 4 create a strong likelihood that effective programs will be excluded from the recognition process. We found that, overall, the nomination procedures were not sufficiently systematic and comprehensive to include all interested and eligible programs; the application criteria were not clearly defined; the procedures used to obtain data on those criteria were adequate, although sufficient data were not obtained; the review teams lacked individuals with the necessary methodological skills to interpret any evaluation information in the applications; and the recommendations made by reviewers were subjected to change by a steering committee that had no additional data. Table 2.3 summarizes these findings, which are discussed in detail in the following sections of our report.

**Table 2.3: Summary of Findings Concerning the Components of the Drug-Free School Recognition Program**

Factor analyzed	Threat	Probable effect
Nominations	Not systematic or comprehensive	Type I error
Application criteria	Not clearly defined	Type I or II error
Data	No evidence of effectiveness	Type II error
Reviewers	Lack of methodological skills	Type I or II error
Decisions	Not made by the most well-informed reviewers	Type I error

Note: A type I error is the exclusion of strong programs; a type II error is the inclusion of weak programs.

**Nomination Process Neither Systematic Nor Comprehensive**

In general, we found limitations at the earliest step of the nomination process that may have ruled out a wide search for effective practice. First, the Department of Education did not provide guidelines to those responsible for nominations concerning dissemination of the opportunity to apply or initial screening of applications. Although Department of Education staff told us that they tried to discuss program nomination methods with some nominators, there was no systematic effort to achieve this goal. As a result, programs with strategic contacts may have been nominated regardless of their quality. Of course, rigorous later evaluation, when it exists, corrects for original nominations not based on merit; thus, once a program enters the selection process, any advantage it may have gained at the state and local level should be lost.

Conversely, weak nomination methods can mean that strong programs may be prevented from participating in the recognition process. First, during the 1989-90 cycle, only 44 states participated in that process; thus, effective programs in 6 states and the District of Columbia may have been overlooked. Second, nominators may choose to consider only programs they have sponsored or funded. Third, since all nominators have a maximum number of nominations, sources with many strong programs and a low nomination limit may be forced to screen strong programs out of the process. Our concern is that some promising programs may not have been included in the nomination process.

**Application Criteria Not Clearly Defined**

We found that the Department did not provide concrete definitions of the data a school should provide to demonstrate successful performance on the application criteria, and that reviewers did not agree among

themselves. In one case, a site visitor was said to have held to very stringent requirements for the data necessary to show adequate performance, while the second reviewer had already decided that the program should be highly recommended. Another site visitor required extensive additional documentation from a school. One reviewer also commented to us that different review team leaders held applicants to different standards, requiring either more or less evidence than was required by the Department of Education. As a result, this reviewer suggested that receiving recognition may have been as dependent on which team conducted the visit as on the quality of the program. All these observations illustrate the fact that there was inadequate agreement on both the data needed and the standards used in evaluating performance on the application criteria.

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## Multiple Data Sources But Key Gaps

### The Procedures

We judged it a strength of the Department of Education procedures that multiple data sources were used, with site visits conducted to verify the information presented in the applications. These site visits appear to have been a useful tool in gathering additional evidence about the applicants' programs, judging from the changes in reviewers' scores following the visits. As a gauge of reviewers' impressions, we examined the scores assigned to applications during the preliminary 1989-90 review and found that they were substantially different from those assigned following the site visits. We randomly selected 6 schools (3 that received recognition and 3 that received site visits but were not recommended for recognition) to review in detail. The change in scores following site visits was such that the 3 top schools (based on final scores) of the 6 we studied were indeed those that received recognition; of the 3 schools that initially scored highest in our sample, 2 dropped significantly as a result of the addition of the site-visit data and consequently did not receive recognition.

These changes in the panel's evaluation of the schools' programs suggest the importance of the visits. If selections had been made on the basis of the application alone, both kinds of errors could have been made—that is, school programs that reviewers ultimately considered strong might have been overlooked and school programs that finally were not considered strong by the reviewers might have been selected. However, because initial views based upon preliminary application information

were supplemented by site visit evidence, there was stronger evidence for reviewers to base their recommendations on.

In addition, the reliability and validity of the site visit data were increased by sending two reviewers to each school. Value judgments may be neutralized by the presence of a second reviewer, and some potential conflicts of interest may be avoided. In addition, the Department of Education required that the pair be of different professional backgrounds and not review schools in their home states.

### No Evidence of Effectiveness

A major, indeed critical, shortcoming in the overall validity of the recognition awards was the fact that applicants were not required to describe the data and results of any process or outcome evaluation. While the application specifically asked "What methods do you use to measure the effectiveness of your drug education program?", it did not ask the corresponding question, "What is your evidence for the effectiveness of your drug education program?" Programs were commonly awarded recognition even when there was no evidence whatsoever of their effectiveness, thus potentially allowing weak programs to receive recognition. Three reviewers we interviewed supported the need for effectiveness evidence by suggesting that the recognition effort require applicants to demonstrate not only promising design features but actual successful outcomes.

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### Review Teams Lacked Key Skills

We found that the Department did not require the participation of reviewers with skills in research and evaluation or in any type of scientific data analysis. The reviewers were required to have expertise in school administration, teaching, parenting, law enforcement, or community coordination. Evidence of effectiveness may not be properly interpreted unless reviewers have appropriate methodological skills, and such data may not even be provided if they are not specifically required (as previously noted) and if the review panel, by its composition, signals a lack of interest in evaluation.

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### Decision-Making Weaknesses

We found that the recommendations of knowledgeable reviewers were subject to change at the final stage by a steering committee with no additional data and no formal guidance. The steering committee, made up of nonfederal reviewers, reviewed the recommended programs (and any others on which reviewers did not agree). It could reject recommendations, and did so in 10 of 61 cases in 1989-90. The Secretary then made the final decisions. There were no written procedures to guide the

decisions either of the steering committee or the Secretary and no requirement for written justification of changes.

Department of Education staff and steering committee members asked program reviewers for clarifications of their recommendations only when they had questions; when there were no questions, the reviewers were not consulted. Staff in the office of the Secretary did ask one reviewer for clarification in 1989-90 after receiving the final steering committee recommendations.

It is not clear what function the steering committee served in determining which programs deserved recognition since it possessed no additional valid data pertinent to the application criteria. In fact, the committee had only part of the existing data—that is, it had only the written information generated at the prior stages of the recognition process (applications, site visit reports, and panel review sheets). In addition, inconsistent application of the criteria at the two stages appeared to be a possibility since there was no guidance for the steering committee's final review. Indeed, Department of Education officials told us that the committee's reversals of reviewers' recommendations were not based on effectiveness questions but rather on stricter application of the Department's policy requiring that programs emphasize a no-use approach. The 10 reversals in 1989-90 thus were based on philosophical differences rather than effectiveness questions. Yet public policy in this area would seem to require not merely conformance with a particular approach but also some determination that programs receiving recognition actually work. The current final review procedures continue to make it possible for strong programs to be overlooked in the recognition process.

# Exemplary Program Study

The goals of the Exemplary Program Study were to provide models of state-of-the-art drug abuse prevention programs that may be adapted by others and to focus national attention on exemplary prevention programs. Eligible programs could serve any age group. Unlike the Department of Education's Drug-Free School Recognition Program, this HHS recognition effort was largely managed by a nonfederal organization using much more limited resources and with much less involvement of agency officials before the final decision step.

In this chapter, we describe the Exemplary Program Study and, as in chapter 2, assess the underlying policy and the five procedural factors that lead to recognition awards.

## Procedures of the Exemplary Program Study

The current recognition effort of the HHS Office for Substance Abuse Prevention (OSAP) had its origin in 1986 when the National Association of State Alcohol and Drug Abuse Directors (NASADAD) was awarded a contract by the Alcohol, Drug Abuse, and Mental Health Administration (ADAMHA) for a study to identify 10 exemplary drug abuse prevention programs. OSAP has continued to contract with the association to support staff work in managing an annual nomination and review process. OSAP also contracted with another organization for support services, including reviewers' travel. In 1989-90, OSAP spent \$36,599 on the recognition effort.<sup>1</sup> The evolving design of the Exemplary Program Study has included several revisions to the procedures and to the 10 application criteria used to evaluate applications. Programs were nominated through a state agency or national organization. Applications were examined first by individuals and then by a panel of reviewers, who selected a set of programs to recommend to the agency for recognition. The overall process is shown in table 3.1.

**Table 3.1: Main Procedures and Timetable of the Exemplary Program Study**

Procedure	Timetable
Applications submitted by programs to nominating sources	February
Nomination of eligible programs by official sources	March
Preliminary review of applications	April
Review of top applications by panel	May
Final slate of nominations sent for OSAP approval	May

Source: NASADAD

<sup>1</sup>According to NASADAD officials, their organization chose to expend an additional \$5,831 of their own funds to complete the project rather than assess the government for a contract cost overrun.

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## Program Development

OSAP has largely left the recognition effort design to NASADAD. The review procedures were originally designed by NASADAD's director of prevention services. An 11-member committee helped direct the program by commenting on the application and procedures each year. The application forms were revised prior to the 1989-90 award cycle. The guiding philosophy of the program was developed by the state officials and staff of the association with the help of state level alcohol and drug abuse prevention coordinators who form the National Prevention Network (NPN), which is affiliated with NASADAD.

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## Nomination Process

Applications were submitted by programs to their state's alcohol and drug abuse agency or to 1 of 56 national organizations. Each state and national organization was limited to 4 nominations. There was no formal guidance concerning how to conduct the nomination process or screen applications. The eligibility criteria stated that nominated programs must have been in place long enough to have evidence of success, though no such evidence was required. In the 1989-90 cycle, NASADAD received 69 applications, down from the 90 received in the previous cycle.

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## Application Procedures

The application included a cover sheet, an abstract, and a program narrative limited to 12 single-spaced pages. The entire application was not to exceed 17 pages, including table of contents, cover sheet, abstract, organizational chart, and budget page. No other materials were to be submitted. Applications were judged on 10 equally weighted general dimensions, such as program philosophy, goals, activities, and replicability. A full list of the dimensions is given in table 3.2. The application packet gave directions for answering from 2 to 6 specific questions under each dimension.

**Chapter 3**  
**Exemplary Program Study**

**Table 3.2: Exemplary Program Study Application Dimensions**

Dimension	Description
Philosophy	Describe the philosophical framework or theoretical model on which the program is based. A brief review of any relevant prevention concepts may be included that help describe a clear, state-of-the-art prevention philosophy. Please include a statement as to the program's adherence to a no responsible use message [that is, a no-use message].
Background and need (program planning)	Describe the background that led to the program's development and the gaps or needs the program fills. A brief description of relevant prior work, observations, or experiences of the applicant program may be included here. Information on formal or informal needs assessments may also be included. Please include local statistics only.
Goals and objectives	State concisely the goals and objectives of the program. Goals refer to the broad, generalized statements of purpose. Objectives refer to the measurable expectations of the program.
Evaluation	Provide information on the program's process evaluation strategies and outcome/impact evaluation. The process evaluation involves the design and collection of data that provides a description of the implementation of the project (for example, description of size and nature of target population, amount and type of activities, staff characteristics). Process evaluations include information on data collection procedures, such as recordkeeping, tracking, and monitoring the delivery of the program. The results of process evaluation should be a description that others who wish to can use to replicate the program. The outcome/impact evaluation demonstrates whether the program had the intended effect on the target population. Applicants should describe their evaluation designs in detail.
Marketing and promotion	Describe promotional and marketing strategies that showcase the programs within the community and respective target population(s). This section should describe the strategies used to heighten public awareness, commitment, and involvement.
Target population(s)	Describe the target population(s) of the program. Indicate whether the program targets specific groups and individuals or whether the program is comprehensive. Demonstrate that the target audience is well-defined by describing special characteristics, such as risk factors, ethnic and cultural considerations, and socioeconomic characteristics. If the program is comprehensive, include a description of community-wide or statewide characteristics, needs, and problem areas.
Activities and strategies	Describe the approaches and methods used to accomplish the stated goals and objectives. Applications must clearly describe the strategies and activities used, including the scope, intensity, and duration. Programs need to indicate whether they use a specific strategy targeted to a specific group or whether they use multiple strategies. Where appropriate, include information on strategies that give special attention to the unique needs and concerns within the target population(s). Strategies may include, but not be limited to, the following: information, education, social competency skills, alternatives, law enforcement, community development, and social policy.
Community coordination	Describe coordination and networking efforts that exist with local, state, and/or federal programs or systems. Linkages that promote partnerships and supportive relationships should be sufficiently detailed. These systems may include but not be limited to the following groups: religious institutions, schools, government, public and private sectors, community groups, law enforcement, judicial system, business and industry, media, service and social organizations, and health delivery systems.
Replicability	Describe program documentation procedures. Sufficient program documentation is needed from exemplary programs so that other organizations can adapt successful models.
Program management	Describe the organizational structure of the program and indicate organizational relationships and the staffing pattern. A description of planned mix of background, training, skills, and/or personal qualities needed for the program staff is appropriate. An organizational chart should also be included as an attachment. This section should also include a description of the resources available to the program, including the program budget. The budget information should include both sources of support (for example, grants, fees, fund-raising, in-kind services) and expenditures (for example, staff costs, purchased services, equipment). Applicants should attach a budget form.

Source: NASADAD

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## Application Criteria

NASADAD officials told us that the application dimensions and questions were developed from the association's own materials and philosophical statement, but that they were general and, with the exception of a required no-use message, did not specifically state those desired or necessary features believed to characterize exemplary prevention programs. However, applicants were also given "Principles of Effective Programs," a chapter drawn from the association's book entitled Prevention in Perspective, which does include such detail and recommendations.<sup>2</sup>

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## Selection and Training of Reviewers

The Exemplary Program Study involved a two-step review process with initial reading by individuals and later review by a panel. In 1989-90, 33 individuals read the initial applications, and a panel of 10 judged the applications of the finalists. Two of these panelists were also preliminary reviewers, and three had been reviewers in the previous cycle. All reviewers and panelists were chosen by NASADAD, with the approval of OSAP. NASADAD officials told us that they selected reviewers and panelists with professional experience in prevention or in related fields such as education. Most participants had at least a master's degree, had worked in prevention programs in state agencies, or had been involved in drug abuse prevention at the national level. The review panel consisted of 2 state directors, 4 NPN members, 2 national organization representatives, and 2 officials from programs recognized as exemplary in earlier years.

Neither initial reviewers nor review panelists received formal training. The initial reviewers worked at home alone, reviewed approximately six applications each, and did receive an information booklet describing the review procedures and the NASADAD philosophy. The second stage review panel members met only once and proceeded to review materials without receiving any separate or specific training. Many of the reviewers and panelists had prior experience with similar recognition efforts at the state level.

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## Review Procedures

In the first stage of review, three readers scored each application (assigned in such a way as to ensure that individual reviewers did not receive applications from their own state or national organization). Readers used their own judgment of merit in awarding up to 10 points

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<sup>2</sup>National Association of State Alcohol and Drug Abuse Directors and the National Prevention Network, Prevention in Perspective (Washington, D.C.: January 1989).

for each of the 10 general dimensions; no written justification or comment was required. The readers returned scores by mail and NASADAD staff averaged the three scores to prepare a rank-order listing of the top 20 to 40 percent of the applications.

NASADAD staff then convened the second stage review panel and assigned the top-rated applications for a second round of reading and discussion. Before the meeting, two panel members read each application and assigned scores for each of the 10 dimensions, which were weighted equally. Each panelist was a primary reviewer for 6 applications and then received the remaining applications at the start of the 2-day meeting. The panel as a whole considered each application for about 15 minutes, divided between the two primary reviewers' 5-minute presentations and a 5-minute panel discussion. Because the panel began its meeting immediately on the first day, panelists did not have time to read the applications for which they were not primary reviewers. After discussion, all panel members gave a single overall score from 1 to 10 for each program, using whatever formula they wished in determining that score. The average of the 10 panelists' scores was used to rank order the programs again, which was followed by a final panel vote, in order of average score, for or against recognition. When a program was not unanimously voted on for recognition, the process ended. In 1989-90, of 30 finalists, the panel recommended 10 programs for recognition and 7 others for honorable mention, using similar voting procedures. There was no formal definition for the honorable mention category to suggest in what way these programs were less exemplary.

## Selection Process

NASADAD officials forwarded the panel's slate of recommended programs to OSAP, where the director made final decisions. In the 1989-90 cycle, the director accepted the recommendations without change. No higher levels of HHS reviewed the decision of the OSAP director. There were no written guidelines covering the final selection decisions. Programs received written notification of the decisions and, if they requested it, written feedback.

## Assessment of the Underlying Policy of the Exemplary Program Study

We found mixed results concerning the recognition effort's consideration of a variety of potentially effective strategies. The NASADAD materials themselves stressed the general public health philosophy that there are many ways to intervene to prevent drug use since it results from a complex interaction of agent (drug), host, and the environment. However, the specific application materials did not fully reflect this view and, in

fact, emphasized a particular approach by requiring applicants to “include a statement as to the program’s adherence to a no responsible use [that is, no-use] message.” The disagreement among reviewers that we observed demonstrated a lack of consensus on the importance of the existing application criteria.

### Emphasis on a No-Use Approach

In developing the application requirements, OSAP and NASADAD asked applicants to adhere to a no-use approach for illegal use of alcohol and other drugs. This requirement, like the similar one in the Drug-Free School Recognition Program, prohibits the evaluation and recognition of programs with any component of responsible use for youths, such as the “contract for life” used by SADD.<sup>3</sup> As we discussed in the case of the Drug-Free School Recognition Program, the agency has the discretionary right to set limits on its recognition effort. While there is not a consensus about the merits of no-use versus responsible-use approaches, there is also no empirical evidence of the harmfulness or superiority of either approach. In the absence of such evidence and the presence of widespread drug use in our nation, the goals of the recognition effort would therefore be best met by allowing consideration of a wide range of approaches and by awarding recognition on the basis of merit and evidence of effectiveness. In this way, if either approach was found to be not generally effective in preventing drug use, the search for effective models would not have to begin anew.

### No Basis for the Application Criteria

It was not clear why some of the application criteria had been chosen; we found no documentation that they were based on empirical evidence. For example, a number of sections—such as marketing and promotion, target population, and management—were potentially informative to the reviewers; however, they were not related to success or “exemplariness” in the research literature, as discussed in appendix I. Indeed, we found evidence that the application criteria included dimensions that lacked consensual support, as evidenced by divergencies in the scoring of applications. We examined the scores provided by primary reviewers on each section of the applications of programs that received recognition and found that sections on replicability and program management received the greatest number of 5 and 6 ratings (on a scale of 10). However, programs that received such relatively low scores on those dimensions were not rejected from further consideration, suggesting perhaps that reviewers did not consider these criteria to be as important to

<sup>3</sup>Unlike the Department of Education, HHS does not cite any legal mandate for this requirement.

exemplary status as other dimensions were. In addition, at least one review panelist stated that he tended to pass over the section on program management altogether, again suggesting that this category was not universally considered important. The problem here is that, depending on the circumstances and the reviewers, the use of questionable application criteria could alternatively result in the inclusion of weak programs, whose weaknesses are documented in these ignored sections, or the exclusion of strong programs that have exemplary qualities on dimensions rather than criteria (for example, participant involvement, family involvement, cultural sensitivity, and comprehensiveness).

## Assessment of the Procedures of the Exemplary Program Study

We focused our procedural assessment on five main factors: (1) the nomination procedures, (2) the criteria used to evaluate programs, (3) the data obtained on the criteria, (4) the reviewers, and (5) the decision process. Weaknesses in 3 of the 5 factors create a strong likelihood that ineffective programs will be recognized, and weaknesses in 4 create a strong likelihood that effective programs will be excluded from the recognition process. We found that, overall, the nomination procedures were not sufficiently systematic or comprehensive to include all interested and eligible programs; the application criteria were not clearly defined; the procedures used to obtain data on those criteria were weak, and sufficient data were not obtained; and the review panel lacked individuals with the necessary methodological skills to interpret any evaluation evidence. We did find that recognition decisions were based on the recommendations made by the most well-informed reviewers. Table 3.3 summarizes these findings, which are discussed in detail in the following sections of our report.

**Table 3.3: Summary of Findings Concerning the Components of the Exemplary Program Study**

Factor analyzed	Threat	Probable effect
Nominations	Not systematic or comprehensive	Type I error
Application criteria	Not clearly defined	Type I or II error
Data	Available data not fully utilized and not based on multiple sources	Type I or II error
	No evidence of effectiveness	Type II error
Reviewers	Lack of methodological skills	Type I or II error
Decisions	None	None

Note: A type I error is the exclusion of strong programs; a type II error is the inclusion of weak programs.

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### Nomination Process Neither Systematic Nor Comprehensive

As in the case of the Drug-Free School Recognition Program, we found that the nomination methods used in the Exemplary Program Study were neither systematic nor comprehensive. Because programs must have been nominated for recognition, those with strategic relationships with the nominating agencies may have been given preferential consideration for nomination. Although it is true that weak programs (those nominated through such relationships rather than on merit) would be subject to the evaluation process, it is also the case that excellent programs, without such contacts, could be excluded from the process. Further, because each source was allowed only four nominations, some eligible programs may not have received nomination. The decline in nominations (from 90 the previous year to 69 in 1989-90) may reflect, among other things, a general lack of guidance from OSAP and NASADAD to those responsible for nominations, concerning the need for an aggressive search for potential applicants.

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### Application Criteria Not Clearly Defined

We found, first, that some of the dimensions OSAP asked readers to use in evaluating applications (shown in table 3.2) appear to be too general in nature. Directions to reviewers lacked specific standards of practice showing what factors in, for example, management or program marketing are essential to promising programs. Without such further explanation and detail, the general dimensions do not serve well as criteria for evaluating the promise of a program and the services provided. For example, in looking at the question of goals and objectives, it is not enough to ask that objectives be measurable. What is needed here is specific guidance about what is a reasonable expectation (based on past research in the drug abuse prevention area) and how it can be measured. The setting of overambitious objectives can often make a promising approach appear to be a failure.

Second, this lack of clarity with regard to the application criteria contributed to problems in the final review panel deliberations. We observed that reviewers did not examine programs on each criterion systematically, often ignored some criteria, and failed to resolve idiosyncratic individual preferences concerning the published criteria, as well as for additional criteria. For example, several reviewers focused on applicant writing style (which is not a criterion), while another commented several times on funding and cost of programs; others felt that evaluation was very important. We did not observe panelists discuss or gain group consensus on how to rate each category or resolve differing preferences. Most important, key terms central to the recognition effort were not defined. Thus, while one primary goal of the recognition effort

was to focus national attention on exemplary prevention efforts, review panelists nevertheless commented on the need to clarify major concepts such as "exemplary" and "prevention." We observed the panel making ad hoc decisions on types of prevention programs eligible for recognition, including ruling programs ineligible because they were packaged (that is, developed elsewhere) rather than local programs (even though the Exemplary Program Study eligibility criteria did not mandate this requirement).

Third, nonspecific application criteria led to widely varying scores by different reviewers. We found large differences between the point values assigned to applications by the preliminary reviewers and those assigned by the review panelists, which provided added evidence of inadequately specified criteria. For all 30 applications considered by the review panel, we compared the scores assigned by the three initial readers to the final average score by the review panelists. Although both groups read the same document and were supposed to apply the same criteria, some of the prevention programs rated highest by the preliminary reviewers were among those rated lowest by the panel, and vice versa. For example, only half of the 10 programs that the preliminary raters scored the highest were selected for recognition by the panel. In addition, the applications ranked 25 and 26 out of 30 by the preliminary reviewers, were ranked 4 and 7 (out of 30) by the review panel, and thus were awarded recognition. This suggests that different recognition decisions would have been made by the preliminary reviewers than were ultimately made by the final reviewers. The discrepancy between these ratings could well be entirely due to the varying interpretations of the application criteria that their overgenerality invites.

In addition to the lack of clarity in the written materials, no orientation or training was provided for either preliminary reviewers or review panelists, which can again cause inconsistency. In the opinion of several members of the final panel, initial readers failed to screen out many applications that they should have because of a lack of the training needed to clarify the general application criteria and standards. Without training, OSAP and NASADAD had little influence over how reviewers evaluated programs on the 10 general dimensions. As a result, the process was unreliable, and weak programs may have received recognition while strong programs may have been excluded.

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## Inadequate Data

### Insufficient Use of Existing Data

Thorough evaluation of existing data was difficult in the brief time allowed for both reading and panel discussion of applications. Primary readers had only 5 minutes each to present facts and opinions to the rest of the panel, leaving 5 additional minutes for discussion. Further, the other members of the panel did not receive the materials until the first day of the meeting, and therefore could not have read the applications prior to discussion. Both panel members and NASADAD staff acknowledged that these time allocations were insufficient to make good use of all the data at hand.

### Need for Supplementary Data

In addition, unlike the Drug-Free School Recognition Program, the OSAP Exemplary Program Study did not gather additional data through site visits. Firsthand observation can help assure that evaluation is not biased by poorly written texts or by limited space on the forms, and can clarify the context within which a program operates. Most important, site visits allow reviewers to judge whether program services have actually been implemented and to what extent. For example, site visits in the Department of Education recognition effort revealed that some program components described as ongoing in applications were not in fact fully implemented. Thus, site visits could help avoid the inclusion of non-exemplary programs in the OSAP Exemplary Program Study as well as the exclusion of potentially exemplary ones. At present, however, OSAP provides NASADAD officials a much smaller budget for the evaluation process than the Department of Education provides for the Drug-Free School Recognition Program.<sup>4</sup> (Site visits cost the Department of Education about \$3,000 each, including travel expenses and honoraria for the two reviewers.)

### No Evidence of Effectiveness

As in the case of the Drug-Free School Recognition Program, we found a critical gap in the data available to judge applications. Although programs were asked to describe their evaluation strategy, designs, and outcomes, they were not required to submit evidence of effectiveness either to substantiate their eligibility or to demonstrate merit. Nevertheless, the application materials did have certain strengths. They explained the difference between process and outcome evaluations. They asked programs questions such as the following: "What methods

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<sup>4</sup>The 1989-90 Drug-Free School Recognition Program cost \$961,000, compared to \$42,430 for the Exemplary Program Study. Three cost areas accounted for the majority of this difference: staffing (\$157,000 for 4.5 staff versus \$18,915 for one staff), meetings (\$361,000 for 2 meetings of 80 people each versus \$11,600 for 2 meetings with 10 each), and site visits (\$355,000 for 123 two-person visits versus no visits).

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do you use to measure the effectiveness of your program?"; "What type of records are kept for use in evaluating and improving program efforts?"; and "What instrument(s) are used to collect outcome/impact data?" However, they did not ask the crucial question for a recognition program: "What is your evidence for the effectiveness of your program?" Programs could have voluntarily addressed the issue, but in materials and in review discussions we encountered little or no evidence of attention to the effectiveness of programs that received recognition awards in the 1989-90 cycle. The reviewers we interviewed were divided on the point; however, some did believe that the recognition effort should require applicants to supply evidence of effectiveness. The problem here, of course, is that without evidence of effectiveness, weak programs can be granted recognition and emulated by others, to no ultimate purpose.

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### Review Teams Lacked Key Skills

Preliminary reviewers had backgrounds in prevention or related fields and review panelists were state directors, NPN members, representatives of national organizations, or previous winners. Methodological or research backgrounds were not required for any of the reviewers or panelists. As a result, the panelists lacked the skills necessary to interpret any evaluations that may have been presented in the applications.

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### Decision-Making Process

While the director of OSAP has had the authority to change the recommendations of the review panel, this has never happened, and the director's decisions are final. This is a strong point of the HHS program: the work of the knowledgeable reviewers was communicated directly to the agency official responsible for recognition decisions.

# Conclusions, Recommendations, and Agency Comments

The Department of Education Drug-Free School Recognition Program and the HHS/OSAP Exemplary Program Study are two efforts to identify exemplary drug prevention programs. The goal of both efforts is to provide program models that others may then confidently replicate. In view of the lack of knowledge about what works, we stressed broad search and reliance on effectiveness data as key elements of the most desirable recognition policy and procedures.

We focused our assessment first on the policies underlying the recognition efforts and then on five specific factors of the overall process leading to the conferring of a federal seal of approval—that is, (1) the comprehensiveness of the nomination procedures, (2) the clarity of the criteria used to judge applications, (3) the validity of the data obtained on the criteria, (4) the qualifications of the reviewers, and (5) the extent to which the final recommendations are made by the most well-informed reviewers.

We found that the policies underlying the recognition efforts plausibly, but perhaps unnecessarily, limited the search for successful programs, and we also found six notable shortcomings or problems in their procedures that limited the usefulness of the efforts. (Four of these shortcomings were shared, and two applied to one program or the other.) We concluded that, with certain changes that we have recommended, both of these recognition efforts have the potential to reach their goals of identifying program models that others may learn from.

## Underlying Policies Do Not Reflect All That Is Known About Drug Prevention

Although the agencies have broad discretion to set policies concerning recognition efforts, we believe these efforts will be most useful when they emphasize a broad search for programs with effective results.

Public opinion and research evidence yield no definitive directions for the search for successful drug abuse prevention programs. Support can be found for both responsible-use alcohol programs (particularly in high school) and no-use approaches (particularly in earlier grades). We could not locate any evaluation that isolated the unique effects of the no-use as opposed to the responsible-use approach. Nevertheless, some experts believe any discussion that appears to tolerate any degree of use is very unwise. On the other hand, the continued presence of SADD chapters in thousands of schools is evidence of widespread disagreement with the policy of no use. While alcohol and tobacco consumption by minors is illegal, high-school-aged youth will soon confront decisions about the legal use of these substances, when they become adults. Accordingly,

many believe that a sound educational program should teach the consequences of the behaviors and also ways to minimize their negative effects. Advocates of such programs argue that since some youths—even in the face of known risks (for example, the risks of smoking, drug and alcohol use, or early sexual experimentation)—will engage in such activities anyway, the most responsible recourse is to accept and deal with the possibility. Present federal recognition effort policies exclude any program that, while not condoning alcohol or tobacco use, may effectively teach ways to minimize the risks of consumption.

Thus, by excluding many programs that have not been proven ineffective or harmful, the no-use policies that guide the two recognition efforts may not serve the goal of these efforts, which is to provide as many successful program models as possible so that others may consider them for emulation. Because there is no evidence that the no-use approach is more successful than alternative approaches, or even successful in its own right, examining only no-use models may result in the failure of the recognition efforts to identify other strategies that are also helping to reduce drug use. Further, should no-use approaches not prove effective in preventing drug use, the search for program models would have to begin again. Therefore, we believe that while the policy of only recognizing programs that advocate no use in addressing the problem of drug abuse is plausible and within the agencies' discretion, it nevertheless is premature. Until it has been established that no use or some other approach works best in preventing drug use, it seems unreasonable for a federal program to preclude examination of many promising strategies.

Allowing programs with some elements of responsible use to compete for recognition would not mean that these programs must or will receive recognition. That decision, as we suggest in other parts of this assessment, should be based on the effectiveness of each program. Further, by considering both no-use and responsible-use programs, the Departments would, in essence, be researching the relative effectiveness of these two approaches.

In addition, the Department of Education's recognition effort further restricted the types of prevention strategies that they would consider by appearing to emphasize the importance of approaches that, while plausible, have not been proven to be more important to programmatic success (for example, resistance-skills training, enhancing self-esteem, and in-school curricula generally) than have other approaches (for example, peer programs, alternatives approaches, and so on).

The immediate result was that the recognition efforts' policies targeted for recognition and emulation programs that constituted a largely unevaluated subset of the universe of prevention strategies. In the long run, if unproven programs receive recognition and later evidence shows that they are ineffective, two unfortunate consequences can follow: (1) all the other programs recognized may also be tarnished and (2) public funds will have been wasted on any replication of the ineffective programs.

## Many Weaknesses Identified in Current Procedures

Even if the recognition efforts' restrictive selection policies allowed consideration of alternative approaches to drug abuse prevention for empirical assessment, or if a particular approach were eventually determined to be the most effective, applications were still not properly appraised in view of the weaknesses we found in the procedures in all five factors reviewed: (1) nominations, (2) application criteria, (3) data, (4) reviewers, and (5) decisions. Table 4.1 summarizes the weaknesses in these procedures.

Table 4.1: Summary of Recognition Effort Weaknesses

Factor analyzed	Weakness	
	Drug-Free School Recognition Program	Exemplary Program Study
Nominations	Not systematic or comprehensive	Not systematic or comprehensive
Application criteria	Not clearly defined	Not clearly defined
Data	<sup>a</sup> No evidence of effectiveness	Not fully used and not based on multiple sources No evidence of effectiveness
Reviewers	Lacked methodological skills	Lacked methodological skills
Decisions	Not made by the most well-informed reviewers	<sup>a</sup>

<sup>a</sup>No weakness found

The nomination procedures were not systematic or comprehensive. Programs could only be nominated for recognition by specific state agencies or designated organizations. As a result, programs that were promising models but that were not well known to a designated nominator, or were not funded by a nominator, or did not have other connections to a nominator, may never have been encouraged to enter the process.

Application criteria were not clearly defined. Vague criteria promote inconsistent evaluation and undercut the purpose of providing clear models of success. We found indications in both efforts that evidence on

the appraisal dimensions was not interpreted consistently by reviewers. Not only did reviewers have different standards for these dimensions, they also had individual preferences with regard to the relative importance of the dimensions.

Recognition decisions in the Exemplary Program Study were based on an unduly narrow information set. First, because there was not enough time, review panelists were not able to read applications for which they were not primary reviewers before discussing them. This limited the ability of the reviewers to discuss the content of the applications and to consider all of their strengths and weaknesses, rather than only those parts focused upon in the primary reviewers' presentations.

Second, the application was the only source of data. Lacking site visit data, the Exemplary Program Study rested decisions entirely on a 12-page written application in which only 1 page was devoted to each of 10 diverse criteria. The experience of the Drug-Free School Recognition Program provides support for the importance of the additional data obtained by site visits. Reviewers' opinions of programs changed greatly after site visits—for example, when they found strong program elements that had been so understated in the application that the program would not have been recommended for recognition without the site visit. Conversely, reviewers found that programs had overstated their progress on certain criteria and that the site visit revealed that plans were either not fully implemented or did not meet certain standards. Without site visits, these programs may have been recommended for recognition. It is therefore possible that, using only the limited data of the written application, the Exemplary Program Study has recognized programs that were in fact not up to its standards and has eliminated from recognition others that may have been. The site visits cost the Department of Education approximately \$3,000 each; however, the differences between the preliminary scores and the final scores after the site visits show the importance of the additional data.

Evidence of effectiveness was not required. Both recognition efforts failed to judge applicants on the effectiveness of their work. That is, effectiveness was not a stated criterion, and thus effectiveness evidence was not gathered in the application or on visits. Both federal efforts had eligibility criteria that required programs to have been in place long enough to be able to show success; however, there was no requirement that this success be demonstrated. Although a program's design and implementation may be judged by reviewers as promising of eventual

success, the present application criteria do not assure that a recognized program has demonstrated its effectiveness.

The review teams and panels lacked individuals with the methodological skills to encourage and interpret evaluations of applicant programs. The lack of research expertise on the review teams, review panels, and steering committees had two implications. First, the current reviewers were not likely to require effectiveness evaluations from the applicants. Second, unless the composition of the panel encourages evaluation, the recognition efforts are not likely to get any strong data on these programs.

The recommendations of the best informed Drug-Free School Recognition Program reviewers were subject to change by a less informed panel of reviewers. In the Drug-Free School Recognition Program, the reviewers' recommendations were reviewed by a steering committee whose members had no additional information. Further, the steering committee was not required to clarify any issue with reviewers before making final recommendations that could have included overturning the better informed reviewers' suggestions.

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## Recommendations

We recommend that both the Secretary of Education and the Secretary of HHS require their recognition efforts to incorporate the following program design revisions and additions:

1. The policies of the recognition efforts should be revised to allow consideration of the full variety of prevention strategies commonly used in schools and other agencies. This may involve consideration of programs that do not adhere to a strict no-use approach towards alcohol or tobacco for adults and youths over age 15. An intermediate step may be to conduct evaluations on the relative merits of no-use and responsible-use approaches, which could provide evidence that supports the current restriction. In addition, application materials should be revised to encourage the submission of applications by programs featuring a broader range of those prevention strategies that the literature suggests hold promise of success.
2. The recognition efforts should be open to all interested applicants through a more comprehensive and systematic call for applications. The nominations procedures need not be abandoned altogether; rather, they should be restructured to ensure equal opportunity for nomination to all eligible programs.

3. The Drug-Free School Recognition Program should add to each review team, and the Exemplary Program Study should add to the review panel, at least one and two members, respectively, who have backgrounds in social science evaluation or research methodology that enable them to conduct skillful analyses of effectiveness evidence.

4. Application criteria should be revised to improve their clarity, and standards of evidence should be established for each.

5. Applicants should be required to submit data demonstrating program effectiveness in order to be considered for recognition. To emphasize to applicants the importance of effectiveness evidence, the application materials should include a separate section that requires applicants to provide specific (preferably quantitative) evidence of effectiveness.

We also recommend that the Secretary of Education eliminate the current veto power held by the Department of Education steering committee and only permit that group to send back recommendations for further review, perhaps with the addition of specific questions to be addressed by the knowledgeable reviewers.

Finally, we recommend that the Secretary of HHS

- expand the Exemplary Program Study data collection design to include site visits, and
- expand the review panel schedule to include a period of training and more time for reading and panel discussion of applications. One way to allow panel members to consider more data would be to subdivide the work among several smaller teams, as is done in the Drug-Free School Recognition Program. A smaller workload would permit all members of a team to read the full set of applications to be evaluated. Teams would then have sufficient time to review the evidence under each application criterion, rather than simply select points.

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## Agency Comments

The Department of Education and HHS provided written comments on a draft of this report. The Department of Education's comments contained no disagreements either with the facts presented in the report or with our analysis of those facts. While noting some steps it is already taking towards accommodating our recommendations, the Department nevertheless reiterated its opposition to considering programs other than those that have a no-use approach to drug abuse prevention. The

Department of Education comments are presented and evaluated in appendix II.

In its comments, HHS agreed with a number of our recommendations and described plans for future action to strengthen their recognition effort, including expanding the call for applications, reviewing the application criteria to improve clarity, allowing the review panel more time and expanding the skills represented, and considering the addition of site visits. The Department provided supporting arguments and information on its recognition policy and also pointed out some factual corrections it believed were needed. After evaluating the information and views provided by the Department, we made some changes in our recommendations to avoid misunderstandings but did not alter their basic content. We found no factual errors requiring correction. The HHS comments are presented and evaluated in appendix III.

# Drug Abuse Prevention Literature

We reviewed the research literature on drug abuse prevention, focusing on three different issues. First, we wanted to learn what strategies, if any, had been conclusively shown to be related to program success. Next, we wanted to know if certain strategies were more promising than others. Finally, we wanted to learn about the relative merits of no-use (emphasized in the Departments' policies concerning recognition) and responsible-use approaches to drug abuse prevention.

We first tried to identify strategies proven to be successful by focusing on 4 recent reviews of previous literature, 2 of which were meta-analyses that synthesized findings across studies (Schaps, et al., 1980, 1981; Tobler, 1986, 1989). These reviews all showed mixed results—that is, strategies were successful in some studies and not in others. The reviews also showed that most of the studies had been poorly conducted. No strategy was conclusively demonstrated to be successful.

Second, however, in trying to identify promising approaches, these reviews were particularly helpful. We learned that programs that provided information about drug use only were least often effective. We also learned that early reviews showed approaches teaching communication, decision-making, and self-assertion skills were most promising in changing both attitudes and behavior. However, the effects were still minimal (Schaps, et al., 1981).

Later meta-analyses (Tobler, 1986, 1989) confirmed that there was no evidence of the consistent effectiveness of knowledge-only approaches and also found no evidence supporting self-esteem-only approaches. However, positive effects were noted for peer programs (positive peer influence, peer teaching and counseling) and alternatives approaches (community activities, individual skill-building activities). These latter approaches were particularly effective with high-risk youth. A more detailed analysis of these original studies (Tobler, 1989) also found that the important components of peer programs were a high degree of peer interaction and delivery of services by mental health professionals. However, this reviewer also noted that the effectiveness of peer programs may be directly related to an individual's motivation to change. In other words, peer programs showed greater effects with youths who voluntarily participated than with those who were referred by a friend, treatment agency, school, or parent.

Other studies (Dryfoos, 1990; U.S. Department of Education, 1987) have also suggested not only that single interventions of any kind are ineffective strategies, but also that comprehensive community efforts that are

directed at many of the major social influences on youth (school, parents, media, police, and so on) are required. Further, the authors of the Department of Education report argue that no curriculum will be effective if it is not part of a comprehensive effort. The authors stated that there is no evidence that would justify recommendation of any curriculum package available at that time.

Finally, we found evidence of pessimism concerning the strict adherence to a no-use philosophy, despite the belief by many that this is the only sound approach. Polich, et al. (1984) noted that because of the wide use and acceptability of alcohol, no existing approaches (including no use) would likely be successful against adolescent drinking. Moskowitz (1989) showed evidence of a lack of consensus about whether abstinence or responsible use is the most appropriate goal with regard to the use of alcohol. Goodstadt (1988) also noted that a no-use approach ignores the realities of use and further that more responsible use of a substance may be an appropriate intermediate goal of a program aimed at populations who use them.<sup>1</sup> In an effort to learn more about this issue, we asked these three authors if any studies had compared no-use and responsible-use approaches in a single study. We did not independently identify any such studies, and the authors were also not aware of any. Thus, there is no empirical evidence showing that one approach is more successful than another, and likewise there is no evidence that either approach would encourage alcohol or drug use.

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<sup>1</sup>Over 90 percent of young adolescents report having consumed alcohol before graduating from high school.

# Comments From the Department of Education

Note: GAO comments supplementing those in the report text appear at the end of this appendix.



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

Eleanor Chelimsky  
Assistant Comptroller General  
United States General Accounting Office  
Washington, DC 20548

APR 22 1991

Dear Ms. Chelimsky:

This letter is in response to your request for comments on the draft report by the General Accounting Office entitled, DRUG PREVENTION: Federal Efforts to Identify Effective Programs Need Stronger Design.

The General Accounting Office study details an assessment of the underlying policy and procedures of the 1989-90 Drug-Free School Recognition Program. Department staff have reviewed the comments and recommendations of GAO and are in agreement with some of the identified program weaknesses. We do, however, have some serious concerns about the draft report. Foremost among these concerns is the unsubstantiated conclusion that there is some utility, as well as widespread support, for a responsible use approach to drug education and prevention. A responsible use message is out of step with the philosophy of the Administration and Congress. Drugs, including alcohol and tobacco, are illegal for school-aged children. Therefore, the responsible use approach contradicts existing laws and we believe threatens to reverse significant progress that has been made in reducing the levels of drug use. There also seems to be confusion as to the primary purpose of this program, which is not research oriented.

In an effort to provide additional information and address our concerns, we respond as follows to the GAO recommendations.

Concern # 1

Underlying policies do not reflect all that is known about prevention.

GAO Recommendation

"The policies of the recognition efforts should be revised so that they allow consideration of the variety of prevention strategies commonly used in schools and other agencies. This may include consideration of programs which do not adhere to a no-use philosophy. An intermediate step may be to conduct evaluations on the relative merits of no-use and responsible-use approaches which could provide evidence supporting the current restriction. Also, application materials can be revised to encourage a broader range of prevention strategies that the literature suggests hold promise of success."

400 MARYLAND AVE., S.W. WASHINGTON, D.C. 20202-6100

See comment 1.

See comment 2.

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Response

See comment 3.

The Drug-Free School Recognition Program is funded under the Drug-Free Schools and Communities Act (Act) and must, therefore, be administered consistently with the requirements of the Act. Section 5145 of the Act states that, in order to be eligible to receive Federal financial assistance, a local educational agency must certify that it has adopted and implemented a drug prevention program that, at a minimum: conveys to students that the use of illicit drugs and the unlawful possession and use of alcohol is wrong and harmful; includes standards of conduct that clearly prohibit the unlawful possession, use, or distribution of illicit drugs and alcohol by students on school premises or as a part of any school activities; and includes a clear statement that sanctions will be imposed on students who violate the standards of conduct.

In keeping with these statutory requirements for drug prevention programs, the Drug-Free School Recognition Program recognizes schools that convey a clear "no use" message. The Department fully supports this approach, and the GAO study agrees that the Department has discretion to set limits on its recognition efforts. Indeed, in working with school-aged children, for whom drugs, alcohol, and tobacco are illegal, a "responsible use" approach, partially defined by GAO as one that would "encourage tobacco, alcohol and drug use," might run afoul of the statutory requirements described above and, certainly, should not receive national recognition for encouraging youngsters to engage in actions that are unlawful.

See comment 4.

Concern #2

The review panel lacked individuals with methodological skills to interpret evaluation of applicant programs.

GAO Recommendation

"At least one member of each review team in the Drug-Free Schools Recognition Program and two members of the review panel of the Exemplary Program Study should have backgrounds in social science evaluation or research methodology that allow skillful critique of effectiveness evidence."

Response

The review panel's composition is predicated on the premise that a comprehensive approach to drug prevention is a collaborative effort involving the school and community beyond the school building and school day. Therefore, panelists should represent four of the critical groups, such as educators, law enforcement officials, and community and parent organizations, whose participation is essential in a comprehensive drug prevention

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See comment 5.

program. Given the nature and design of the school/community programs and the type of effectiveness data called for in the past, we did not think it was essential to have a person with a research background on each panel.

Concern #3

The nomination procedures were not comprehensive or systematic.

GAO Recommendation

"The recognition efforts should be open to all interested applicants through a more comprehensive and systematic call for applications. The nomination procedures need not be abandoned altogether, rather, they should be restructured to ensure equal opportunity for nomination to all eligible programs."

Response

We believe the nomination process is systematic. Program announcements are made each year in early summer to every Governor and Chief State School Officer. There is a liaison, appointed by the Chief State School Officer in every State Department of Education, a contact person designated by each Governor, a coordinator in every State from the National Federation of Parents for Drug-Free Youth, and the Council for American Private Education representing 14 private school associations (15,025 schools, 3.6 million students). Each has responsibility for the nominating process under the direction and guidance of the Department.

The Department provides a one-day orientation for representatives from all nominating entities during which program criteria and process are discussed in detail. At that meeting, two State liaisons present how their State selection process is conducted and address questions and concerns. State representatives not attending the orientation are mailed all materials and a follow-up call is made by program staff to discuss any questions or concerns.

See comment 6.

We are currently considering how we might broaden participation to assure that every school is aware of the program and is provided an opportunity to participate. Believing that one of the best ways to quickly and efficiently access a targeted group is by working through existing organizations with established audiences, we are considering expanding the pool of nominating entities to include the National Parent Teachers Association by allotting them a designated number of nominations per State. Also under consideration is a broader announcement of the program through the media and publications targeting administrators, teachers, parents, and community groups to assure that local school districts are aware of the program and application

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procedures.

Concern #4

Effectiveness of programs was not a criterion for recognition.

GAO Recommendation

"Data assessing effectiveness should be required in order to be considered for recognition."

Response

Department officials and staff review and refine program criteria, procedures, and review instruments each year. We concur that during the first three years of the program, failure to require the collection of outcome data was an area of weakness. Schools were only required to address effectiveness by describing the types of records kept for use in evaluating and improving their prevention efforts and the methods used to measure the effectiveness of their programs. Documentation in these areas was examined during on-site visits.

See comment 7.

In the fourth year of the program (1990-91), we asked for outcome data under the section, "Recognizing, Assessing, and Monitoring the Problem." Each applicant was asked to: "Compare in chart form and discuss changes to date from your baseline data since program inception, including but not limited, to student surveys; student participation-level in drug-free activities; use of intervention and referral services, school and law enforcement records of drug-related incidents; and level of use, possession and distribution of drugs, including alcohol and tobacco."

At your recommendation, we will consider adding an individual to the Steering Committee to provide advice on how we might revise program criteria to best meet the needs of schools and our own requirements for data collection on student outcomes.

GAO Recommendation

"Criteria should be reviewed to improve their clarity and to establish standards of evidence on each."

Response

See comment 8.

The Department continues to refine the criteria and procedures for the Drug-Free School Recognition Program and the criteria for recognition this year are in concert with this recommendation.

Concern #5

Decisions.

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GAO Recommendation

"Eliminate the current veto power held by the ED steering committee and permit that group only send back recommendations for further review, perhaps with specific questions to be addressed by the knowledgeable reviewers."

Response

The role of the steering committee is to advise the Department on all aspects of the program, including developing criteria for the selection and identification of effective drug prevention programs and making recommendations to the Secretary for schools to be nationally recognized.

The steering committee is comprised of individuals with national expertise in drug prevention. During their review process the steering committee has access to all documents. We believe that members of the steering committee are not less informed, but have experience and the capability to identify issues that may have been overlooked by the panels. When the steering committee conducts their review, if they have questions that require clarification, the site visitors meet with the committee to address these concerns.

If the committee agrees with the panel's recommendation, the school is recommended to the Secretary for recognition. All rejections are documented by the committee and reviewed by the program staff director. To date, we have found this an effective means to ensure program consistency in the decisionmaking process.

Summary

The Department views the Drug-Free School Recognition Program as an important effort toward achieving the national goal for education of Safe, Disciplined, and Drug-Free Schools by the year 2000. Data from the most recent surveys are somewhat encouraging -- illegal drug use is declining. We will continue our policies of supporting programs that adhere to a strict "no use" policy and hope that this current trend continues. We appreciate the opportunity to respond to the Draft Report before its publication. If any of your staff would like to meet with us to discuss our comments, we would be happy to do so.

Sincerely,

  
for John T. MacDonald

See comment 9.

The following are GAO's comments on the Department of Education's letter dated April 22, 1991.

## GAO Comments

1. The Department's foremost concern is with our "unsubstantiated conclusion that there is some utility, as well as widespread support, for a responsible use approach to drug education and prevention." However, the Department presents no evidence to rebut our analysis on these two points. No evidence exists showing the universal utility of any specific approach; this knowledge gap is the basis for our view that all approaches should be subjected to further evaluation. There can be no doubt, however, about the widespread support for approaches other than the strict no-use option favored by the Department, particularly with regard to alcohol use by older youths. Such support is shown by the thousands of schools with chapters of Students Against Driving Drunk (SADD), as well as by the views we heard expressed by some (though not all) participants in the Department's recognition effort and by noted drug abuse prevention researchers.

2. Responsible-use approaches do not advocate, tolerate, or in any way encourage drug use. We therefore believe that the Department is incorrect in suggesting that these approaches contradict existing laws against tobacco, alcohol, and drug use for school-aged children. Further, since the Department cites no particular analysis, and because we think one could not be reliably done in any case, we believe that the Department is incorrect in suggesting that (1) no-use approaches in school are a cause of declining youth drug use, and (2) use of any other approach would reverse this trend.

3. The Department believes that because the recognition effort is funded under the Drug-Free Schools and Communities Act, it must "therefore be administered consistently with the requirements of the Act." We agree. However, the requirements for school programs funded under this act, such as those cited by the Department, could arguably be quite different from those in a broad-based national search for promising practice. Further, the act does not explicitly either authorize or mandate the recognition effort; the Department could seek other sources of funding for the effort. In addition, even if Drug-Free Schools and Communities Act funds were used and the Department wished to consider only programs which operate in a manner consistent with statutory requirements for schools, we do not believe this would rule out responsible-use programs. The law does not expressly prohibit responsible-use approaches, such as those that teach drunk driving prevention or that may view more

responsible use as the first step towards reducing, then eliminating, use by those already using tobacco, alcohol, or other drugs. These messages may be presented in ways that “convey to students that the use of illicit drugs and the unlawful possession and use of alcohol is wrong and harmful” (see 20 USC 3224a (a)(2)), while recognizing that students may nevertheless choose to engage in these behaviors. Such approaches, which often center on youths’ behavior outside of school, would also not violate the requirements of this statute prohibiting the possession, use, or distribution of drugs on school premises or at school activities. For example, a program that teaches that alcohol use is wrong and harmful but also includes drunk driving prevention and uses a “contract for life”—which the student might invoke after a Saturday night party at a friend’s house—would not appear to be in violation of these sections of the law. (We do, however, recognize that alcohol use by minors violates other laws.)

4. The Department has incorrectly and misleadingly cited the report. At no point do we define a responsible-use approach, as the Department suggests, as one that would “encourage tobacco, alcohol and drug use.” At several points, the exact opposite is clearly stated—that responsible-use approaches do not condone the use of drugs, alcohol, or tobacco. (See pages 2, 11, and 44.)

5. The Department’s comment restates the fact that evaluation expertise was not sought on the recognition review teams. We continue to believe that such representation is crucial for understanding and analyzing the additional evaluation evidence we call for. In recommending that the review teams include members with such skills, we did not intend to suggest that these persons should replace current members, but rather that they should be added to the existing mix of educators, law enforcement officials, and community and parent organization representatives. We have changed the wording of our recommendation to reflect this distinction.

6. The Department cites a plan to broaden awareness of the recognition opportunity. While this will be a useful step, we continue to believe that this alone is not enough to assure equal opportunity for nomination to all eligible programs. In our view, current limits on the number of nominations allowed each nominating source preclude such opportunity.

7. Our aim is that evidence of program effectiveness be the major basis for recognition. In its letter, the Department refers to a change made in

the needs assessment section of the application, which now asks applicants to show how they track indicators of youth drug problems. Such data, however, may or may not be useful in evaluating the effectiveness of a school's specific program. Thus, the Department's action is not yet fully responsive. To clarify our goal, we have changed our recommendation to state that applicants should be required to show evidence of the effects of the program and that this criterion should be emphasized.

8. The Department provides no details on changes made to improve the clarity of both their application criteria and their standards of evidence. We therefore are unable to evaluate any improvement that may have occurred since our review.

9. The Department does not provide any new information to contradict our analysis; rather, it restates its view that the steering committee members are "not less informed" and that they are effective in assuring consistency of decisions. Thus, we continue to believe that the steering committee has less information than the review teams (since they do not have access to the full details of the site visits) and therefore should not be making final decisions that may contradict the recommendations of the review teams. Further, while the steering committee can be quite consistent in their decisions, they may also be consistently incorrect, notably by substituting ideology for evidence. The Department notes that the steering committee can ask clarifying questions; the important point, however, is that they currently need not do so before taking final action. In fact, they acted without asking for more information in all but one case during the 1989-90 cycle while, at the same, overturning 10 of the reviewers' recommendations.

# Comments From the Department of Health and Human Services

Note: GAO comments supplementing those in the report text appear at the end of this appendix.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of Inspector General

Washington, D.C. 20201

MAY 3 1991

Ms. Eleanor Chelimsky  
Assistant Comptroller General  
United States General  
Accounting Office  
Washington, D.C. 20548

Dear Ms. Chelimsky:

Enclosed are the Department's comments on your draft report, "Drug Prevention: Federal Efforts To Identify Effective Programs Need Stronger Design." The comments represent the tentative position of the Department and are subject to reevaluation when the final version of this report is received.

The Department appreciates the opportunity to comment on this draft report before its publication.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "R. Kusserow", written over a light-colored background.

Richard P. Kusserow  
Inspector General

Enclosure

Appendix III  
Comments From the Department of Health  
and Human Services

COMMENTS OF THE DEPARTMENT OF HEALTH AND HUMAN SERVICES  
ON THE GENERAL ACCOUNTING OFFICE DRAFT REPORT "DRUG  
PREVENTION: FEDERAL EFFORTS TO IDENTIFY EFFECTIVE  
PROGRAMS NEED STRONGER DESIGN," GAO/PEMD-91-15,  
DATED MARCH 1991

GENERAL COMMENTS

See comment 1.

It appears from reading this report that the General Accounting Office (GAO) was unclear as to the current purpose of the Exemplary Program Awards. However, at the GAO entrance conference for this study, the Office for Substance Abuse Prevention (OSAP) attempted to make it clear that the Exemplary Program Awards program was not the means for evaluation of programs; that OSAP did have evaluation efforts in place on several levels; and that evaluation reports concerning those efforts would be submitted to the Congress, per a congressional mandate.

Initially conceived before OSAP had its evaluation approach fully developed and in place, the Exemplary Program Awards were intended to identify and recognize successful programs that were making a positive impact in their communities. The Exemplary Program Awards program was designed to highlight certain projects and show appreciation for them as examples of the type of good work being performed in the prevention field. Additionally, as in any award program, the awards have also provided an incentive for continued efforts.

It should be noted that since these programs were neither scientific research projects, nor, in many cases, OSAP-funded programs, they were not designed with rigorous scientific evaluation criteria built into them. After the fact application of such criteria therefore would have been neither practical nor cost-effective.

Currently, OSAP builds an evaluation component into all appropriate programs it funds. OSAP's more scientific approach to evaluating these programs involves a three-tier process comprised of self-evaluation, program-wide evaluation, and nationwide continual, pragmatic assessment of what is being learned in prevention.

For the self-evaluation of OSAP projects, all grantees must allocate at least 15 to 20 percent of their grant funds to evaluation. The results of these evaluations are reflected in grantee quarterly and final progress reports. These reports, in conjunction with site visits and other supporting information, are used to perform program-wide evaluations.

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See comment 2.

Now page 2.

Much of the report is centered on the concern the GAO has with the Federal and National Association of State Alcohol and Drug Abuse Directors (NASADAD) policies for recognizing exemplary programs having a "no-use" policy. GAO focused on "no-use" in the strictest sense on p. ES-3 (i.e., ... "no-use programs are those with a consistent message that any use of drugs, alcohol or tobacco is always wrong and harmful .... ") which is not the definition transmitted to the GAO as OSAP policy. On March 7, 1991, we provided GAO with the following wording: "OSAP's goal is to promote the concepts of no use of any illegal drugs and no illegal or high-risk use of alcohol or other legal drugs. (High-risk alcohol use includes drinking and driving; drinking while pregnant, when using certain medications, or to intoxication.)"

See comment 3.

GAO is recommending that the Federal agencies and NASADAD consider including programs advocating "responsible use" when selecting exemplary programs. However, GAO does not state whether it is referring to programs that condone "responsible use" of all legal and illegal drugs. With so many references to Students Against Drunk Driving, it is unclear whether GAO is only thinking about responsible use of alcohol. The Department's view is that under age use of alcohol is illegal. Most of OSAP's programs, and certainly those at the Department of Education, are targeted at people under age and those at high-risk, such as pregnant women for whom any use creates the increased potential for birth defects. Therefore, it would be inappropriate for OSAP to recognize a program as being exemplary when it is operating under a policy which is not consistent with legal requirements or public health advice. It is also unclear how programs teaching "responsible use" of illegal drugs and use of alcohol and tobacco by minors could effectively measure their prevention success. The argument that minors will soon be of legal drinking age, and should know how to be responsible drinkers before that time is contrary to OSAP's prevention findings which indicate that the longer the first use of drugs is delayed, the better the chances of avoiding problems associated with such use altogether.

See comment 4.

See comment 5.

See comment 6.

This issue of accepting the illegal use of alcohol and other drugs has often been discussed in credible prevention research summaries over the past 2 decades. However, no single study has ever been completed which found conclusive evidence that alcohol and other drug use declines through the use of preventive interventions that include "responsible use" approaches. Therefore, the Federal Government can in no way take a position that it believes is counterproductive, or which condones unlawful behavior on the part of adults or young people at high risk. In recent years, States have participated in delaying the onset of alcohol use through the legal mechanism of raising the purchase age for alcoholic beverages

from 18 to 21. According to the U.S. Department of Transportation, this change alone has resulted in preventing over 10,000 highway deaths since 1986.

GAO RECOMMENDATION

The Secretaries of the Department of Education (ED) and the Department of Health and Human Services (HHS) require their recognition efforts to incorporate the following program design elements:

- 1) The policies of the recognition efforts should be revised so that they allow consideration of the variety of prevention strategies commonly used in schools and other agencies. This may include consideration of programs which do not adhere to a no-use philosophy. An intermediate step may be to conduct evaluations on the relative merits of no-use and responsible-use approaches which could provide evidence supporting the current restriction. Also, application materials can be revised to encourage a broader range of prevention strategies that the literature suggests hold promise of success.

DEPARTMENT COMMENT

We do not concur since we are not in agreement with the "responsible use" approach for the reasons stated above; i.e., it is inconsistent with law and the best public health advice.

GAO RECOMMENDATION

- 2) The recognition efforts should be open to all interested applicants through a more comprehensive and systematic call for applications. The nominations procedures need not be abandoned altogether, rather, they should be restructured to ensure equal opportunity for nomination to all eligible programs.

DEPARTMENT COMMENT

We concur. We will attempt to extend the call for applications process by querying other State agencies (such as State departments of education) and other associations whose members are involved in drug prevention activities.

GAO RECOMMENDATION

- 3) At least one member of each review team in the Drug-Free Schools Recognition Program and two members of the review panel of the Exemplary Program Study should have backgrounds in social science evaluation or research

See comment 7.

See comment 8.

methodology that allow skillful critique of effectiveness evidence.

DEPARTMENT COMMENT

We partially concur. We have already included psychologists and social workers which use commonly accepted practices of program evaluation skills in their disciplines and we do not want to limit the possibilities for acceptable panelists. We will make an effort, however, to find at least one member with a social science evaluation or research methodology background.

GAO RECOMMENDATION

- 4) Criteria should be reviewed to improve their clarity and to establish standards of evidence on each.

DEPARTMENT COMMENT

We concur. Criteria will be reviewed.

GAO RECOMMENDATION

- 5) Data assessing effectiveness should be required in order to be considered for recognition.

DEPARTMENT COMMENT

We concur. Data assessing effectiveness is a key factor for award consideration. As in the past, we will utilize all relevant information in making recognition decisions.

GAO RECOMMENDATION

- 1) The Secretary of HHS should expand the Exemplary Program Study data collection design to include site visits.

DEPARTMENT COMMENT

We concur. Site visits will be included in the evaluation design subject to budgetary constraints.

GAO RECOMMENDATION

- 2) Expand the review panel schedule to permit adding a period of training and also to allow longer time for reading and panel discussion of applications. One way to permit more data to be considered by panel members would be to subdivide the work and assign it to several smaller concurrent teams, as in the Drug-Free School Recognition Program, rather than one large panel. A smaller workload

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would permit all members of a team to read the full set of applications to be evaluated. Teams would then have sufficient time to review the evidence under each application criterion, rather than select points.

DEPARTMENT COMMENT

We concur. This recommendation would enhance the review process. The degree to which this can be accomplished is again dependent on budget and staff resources.

TECHNICAL COMMENTS

It is suggested that the title be changed to: DRUG PREVENTION: Federal Efforts to Recognize Exemplary Programs.

Throughout the document OSAP is identified incorrectly. The correct name is The Office for Substance Abuse Prevention.

Data citations should be given on p. ES-1, second paragraph and 1-1, first paragraph.

Since OSAP does not use "no-use" in the strictest sense, we believe that the definition given on p. ES-3 is inaccurate. We suggest our definition cited on p. 2 of these comments be substituted.

There are numerous references throughout the document to "current research evidence," such as on p. ES-3. As stated above, this research can also be viewed from different perspectives, and should not be considered "state-of-the-art" information. The newly released Drug Abuse and Drug Abuse Research Report does not discuss "responsible use" as a positive approach. It specifically points out that "techniques that have shown promise in preventing children and youth from becoming smokers are now being applied to a broader spectrum of drugs."

GAO statements regarding the inability of the recognition processes to determine whether the recognized programs work (such as on p. ES-7) are inaccurate. Evidence of success is requested in the nomination announcement. The discussion by the review panel includes evidence presented by the programs. Programs with insufficient information are not rated as highly as those which show data or evidence of effectiveness in the community.

Regarding references to the review panelists not being able to read applications before discussing them (such as on p. ES-8), we do not agree. All of the review committee members had the

See comment 9.

See comment 10.  
Now page 2.

See comment 11.

See comment 12.  
Now page 4.

See comment 13.  
Now page 3.

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applications available to them throughout the meeting. They were able to read them at any time during the meeting in addition to the synopses provided by the primary reviewers.

See comment 14.  
Now page 5.

Regarding references to the lack of site visits (such as on p. ES-9), we do not agree that it was necessary for OSAP staff to site visit the programs for a number of reasons. The OSAP budget for the Exemplary Program Awards program is extremely limited; therefore, site visit costs were not factored in. The \$90,000 suggested by GAO for this purpose could never have been considered. The plan, however, incorporated a means for site visiting through the State agencies and national organizations nomination process. Prior to nomination, the nominating agencies site visited the programs, and the review package contained written documentation of the programs' operation.

On p. 1-1, we suggest the sentence in the first paragraph beginning "As reported ..." be eliminated. Add the words "in drug abuse prevention programs" to the next sentence, after "To focus national attention on exemplary efforts in ...." In the second paragraph, we suggest the sentence beginning with "Also ..." read as follows: "Also, in 1987, the Office for Substance Abuse Prevention (OSAP) in the Department of Health and Human Services began a similar effort in collaboration with the National Association of State Alcohol and Drug Abuse Directors...." For the next sentence, we suggest that "reaching varied" be substituted for "for all ages and...."

See comment 15.  
Now page 9.

On p. 1-4, in the first paragraph, twelfth line, we believe the term "guesswork" is inappropriate on the basis that the evaluation criteria was the strictest category in the application.

On p. 1-5, last paragraph, second line, replace the statement "NASADAD which administers" with the following statement, "NASADAD, which under the direction of OSAP, administers...."

On p. 1-7, first paragraph, it is noted that "...the agencies have broad discretion to set such limits." We agree with this; however, the overall report does not seem to recognize this fact.

On p. 1-8, first paragraph, fourth line, we suggest substitute sentences for the one beginning with "Research ...." "Due to a diverse population, research has repeatedly shown that there is not a single type of intervention that is the most effective. However, it has shown that it is a combination of several interventions working simultaneously that produces a reduction in alcohol and other drug use."

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See comment 16.  
Now page 11.

On p. 1-8, first paragraph, last sentence, this sentence is judgmental by the GAO and is not supported or credited to any particular study.

On p. 1-12, first paragraph, fifth line, we suggest eliminating the phrase "which is characterized by uncertainty."

On p. 1-17, fifth line from top, the phrase which suggests that national recognition is "awarded on promise alone" is inappropriate since these awards are based on a formalized set of criteria, including evaluation.

See comment 17.  
Now page 16.

On p. 1-19, first paragraph, ninth line, the phrase which states "few formal records kept on reviewers" is inaccurate since profiles of the reviewers are on file with NASADAD.

On p. 3-1, first paragraph, in the sentence containing "any age group," we suggest the phrase "youth and their families." The phrase "largely managed by a non-federal organization" is inappropriate since NASADAD is under contract to OSAP and performs the contract under the direction of OSAP. The OSAP Project Officer is very involved in essentially every step of the process. Because OSAP chooses to use a services contract to assist in the time-consuming and staff intensive process, it should not be assumed that the Agency is less involved than is necessary. In the last paragraph, the number of exemplary drug prevention programs to be identified should be "20."

On p. 3-2, in the footnote, we question the terminology of "contributed," since NASADAD chose to expend some of their own funds to complete the project rather than assess the Government for a contract cost overrun.

See comment 18.  
Now page 33.

On p. 3-4, second paragraph, eighth line: Evidence of success is requested in the nomination announcement. The discussion by the review panel includes evidence presented by the programs. Programs with insufficient information are not rated as highly as those that show data or evidence of effectiveness in the community. These are neither research programs nor are they necessarily demonstration programs; therefore, the process has to be open and nonrestrictive of programs with limited evaluation resources. Evaluation is an important criterion, but it must be viewed relative to the capabilities of the programs.

On p. 3-10, first paragraph, eighth line, in the sentence beginning "All ..., please substitute "with no review by OSAP," with "with the approval of OSAP." In the second paragraph, it is not "NASADAD's philosophy," rather it's "Exemplary Program Awards program philosophy." In addition, the reviewers were chosen for their expertise in prevention and/or related areas.

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See comment 19.  
Now page 36.

These experienced reviewers do not require training other than a reviewer procedures booklet and a philosophical foundation. (Also can be applied to p. 3-21, first full paragraph).

On p. 3-12, paragraph 2, the fourth sentence infers that a higher level review of the selection decisions would be appropriate. Since this is an OSAP award, departmental approval is not necessary.

On p. 3-13, we suggest the first sentence in paragraph 2 read as follows: "In developing the application requirements, OSAP and NASADAD asked the applicants to adhere to a no-use approach for illegal alcohol and other drug use."

See comment 20.  
Now page 37.

On p. 3-14, third sentence from top: As stated previously, the purpose of the exemplary program is not to collect evidence of effectiveness of "responsible use" vs. "no-use."

See comment 21.  
Now page 39.

On p. 3-18, paragraph 1: The decline in nominations is most likely due to the time it takes for State and local practitioners to participate in the process. Some States opt to not divert valuable time from the provision of prevention services to the voluntary enrollment in this nomination process.

See comment 22.  
Now page 42.

On p. 3-23, paragraph 2, twelfth line, the phrase "the crucial question" is not appropriate. As described in Table 3.1, the evaluation requirement was clearly part of the application.

See comment 23.  
Now page 42.

On p. 3-24, first complete paragraph, we do not agree with the criticism of the review teams. Although each member did not have every skill, collectively the necessary skills were represented by the team.

The following are GAO's comments on the Department of Health and Human Services' letter dated May 3, 1991.

## GAO Comments

1. HHS states that we were unclear concerning the purpose of the recognition effort and, further, that it is "not the means for evaluation of programs." Our report does not state or imply that HHS should actually conduct the evaluations of programs. Rather, we recommend that the recognition effort obtain the results of evaluations and use them in making its decisions about awarding recognition. HHS further implies that it would be inappropriate to apply "rigorous" evaluation standards to the programs being reviewed. The fact that some of the projects being reviewed for recognition may not have been designed as research activities is not pertinent. How HHS evaluates the projects it funds is also not relevant. However, since HHS clearly describes the recognition effort as aimed at identifying "successful programs that were making a positive impact," we must continue to recommend that evaluation evidence be provided by applicants and examined by reviewers to determine the extent to which such claims can be demonstrated by each program.
2. HHS restates OSAP's policy concerning the use of tobacco, alcohol, and other drugs. We believe our report, when taken in its entirety, accurately portrays the OSAP policy, including the view that no recognition can be awarded to programs that raise the issue of "responsible use" for youths. In describing the Exemplary Program Study, we noted that its policy "prohibits the evaluation and recognition of programs with any component of responsible use for youths." (See page 37.) To define the no-use approach, we included a strict general explanation of what it could mean; we also, however, described the variations we noted in the two agencies' recognition efforts, including the fact that OSAP applied a less stringent definition than did the Department of Education.
3. HHS states its belief that our report is unclear concerning the type of programs that we recommend be considered for recognition and that our recommendation is not consistent with public health advice. First, HHS is incorrect in its assumption that we might be referring to programs that "condone 'responsible use' of all legal and illegal drugs." Our report repeatedly states the opposite—that is, that responsible-use programs do not condone drug use. However, to avoid any further possibility of misunderstanding, we have changed the report to clarify the point that our recommendation concerning a broader search for effective programs refers to those that serve older youths (over age 15) and adults and that

offer responsible-use approaches to alcohol or tobacco only. Second, programs that accept the possibility of risky behavior in order to change it are not implausible and deserve evaluation of their effectiveness rather than a priori rejection.

4. Evaluation of any type of prevention program is challenging. We disagree with HHS's suggestion that one type of program (responsible-use) is more difficult to evaluate than any other.

5. HHS criticizes responsible-use programs by citing findings that indicate that delaying the onset of drug use is critical. We do not see any inherent logical contradiction between responsible-use approaches that do not condone use and the goal of delaying first use. A program can both strongly advocate abstinence and also discuss how to more responsibly handle situations where use may nevertheless occur.

6. HHS states that no study has found responsible-use approaches to be effective—which presumably is intended to justify their refusal to consider such programs for recognition. However, it is not correct to imply that these programs have been proven ineffective or harmful; we know of no study that directly compares the effectiveness of no-use and responsible-use approaches. Further, HHS does not cite any evidence to suggest that such approaches are, in its term, “counterproductive.” Even more important, HHS cites no evidence that the preferred no-use approaches have conclusively been shown to prevent drug use. Thus, HHS is not evenhanded in disclosing the absence of effectiveness data. (The evidence of the effects of raising drinking-age laws is not pertinent to a discussion of education programs.) Precisely because the evidence is inconclusive, our report does not offer conclusions about the effectiveness of any type of prevention program. Rather, our recommendation of open consideration of a variety of approaches stems from our finding that no approach is known to be widely effective; in addition, we further recommend that the major criterion for recognition be solid evidence of positive results in preventing drug and alcohol use.

7. Our response to this comment by HHS is contained in foregoing comments 2, 4, 5, and 6.

8. HHS states a plan to extend their search for applications. We believe that, while this is a useful step, it alone will not be enough to assure equal opportunity for nomination to all eligible programs, as called for in our recommendation. Current programs' lack of awareness about the

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recognition effort and limits on the number of nominations allowed each nominating source preclude such opportunity.

9. HHS provided a number of technical comments, many of which we have incorporated into the report.

10. See our response in comment 2.

11. In contrast to the interpretation offered by HHS, it is our view that the report cited offers powerful support for our findings and conclusions. It describes, in an evenhanded manner, a continuing “active” debate over “the relative merits (and achievability) of the goals of abstinence ... or of ‘responsible use’”(p. 36).<sup>1</sup> It describes how programs can adopt diverse goals in the face of this continuing disagreement over both means and ends. The report notes that some “may argue that avoidance of use is the only acceptable objective” (p. 36)—as, for example, do the agency officials directing the recognition efforts; the report, however, then cites data indicating that some youths who experiment with drugs stop on their own, a finding which casts some doubt on the no-use premise. The report offers no evidence proving the effectiveness of either approach and suggests that such evidence is unlikely to be found. The report stresses, as we do, the use of “evidence of effectiveness” in “the selection of programs for continuing development, dissemination, and funding” (p. 38). The report also cites the potential value of Students Against Driving Drunk (SADD), a program with a responsible-use component that, as we reported, would not qualify under the current recognition policies. We believe our interpretation of the current body of evidence is unchallenged by HHS’s comments and is fully supported by the materials it cites.

12. We disagree with HHS’s contention that we are inaccurate in our conclusion that effectiveness evidence is not required. First, HHS is incorrect in stating that “evidence of success is requested.” The announcement asks applicants to describe their evaluation methods and explains different approaches to evaluation; nowhere does it ask for the results of these evaluations. We also found that many of the applications provided no evaluation evidence. Second, HHS is also inaccurate in their characterization of the role of such evidence in the review process. We both observed discussions and reviewed scores; however, we neither heard much discussion of effectiveness nor observed lower scores overall for

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<sup>1</sup>HHS, Drug Abuse and Drug Abuse Research, 3rd Triennial Report to the Congress (Rockville, Md.: 1991).

programs that lacked such evidence. When it was provided, the evidence was, at best, in the form of conclusions rather than data that the review team could independently interpret. To avoid misunderstanding, we have clarified our recommendation to call for an explicit requirement in the application that evaluation evidence be submitted.

13. HHS does not disagree with our major point that reviewers did not have time to read the applications in advance of the actual meeting. By failing to provide the applications in advance, HHS forced reviewers to choose between reading and attending to the discussion. We believe the process would be more effective if reading could be done ahead of time.

14. HHS cites budgetary limitations preventing site visits and states that nominators visited the programs. We acknowledge that visits will add to the recognition effort's cost, but continue to believe that the value of site-visit data is significant and worth the cost. We do not agree with HHS's implication that visits that may have been done by the nominators are an effective substitute. Such visits are not required as part of nominations, and we saw no guidance for what to observe in such visits. Most importantly, we saw no evidence from any such visits in the documentation provided to the review panelists.

15. HHS suggests that "evaluation criteria was the strictest category in the application." We disagree. All categories in the application were equally weighted in the first round of scoring; the final scores were global and contained no reference to specific application dimensions. In addition, in our observation of the panel discussions, we saw no evidence that evaluation was discussed more frequently than other dimensions. In fact, it often was not discussed at all.

16. The literature we reviewed is discussed and cited in appendix I, and the particular statement referred to in HHS's comments, including the direct citation, can be found on page 50.

17. When we asked NASADAD for information on reviewers, no profiles were offered. As a result, we had no evidence concerning them.

18. See our response under comments 1 and 12.

19. HHS is incorrect. We made no inference concerning the proper level of review of recognition decisions; we simply described the current practice.

20. The discussion at the top of page 37 does not suggest, as claimed by HHS, that the purpose of the Exemplary Program Study is (or should be) to collect evidence of the relative merits of no-use and responsible-use approaches.

21. HHS proposes an alternative hypothesis to explain a decline in nominations—that is, that the decline in nominations this past year was related to the time it took to complete the applications. However, HHS presents no evidence to suggest that the average amount of time it took to complete the application in 1989-90 was greater than that for the previous year. This therefore does not adequately explain the decline.

22. As discussed in comments 12 and 15, we found that evaluation was not strongly in evidence in either the application or the review process.

23. HHS states that their reviewers collectively had “the necessary skills.” Since we continue to believe that evaluation skills are important, we maintain our view that there should be a requirement stating that such skills must be represented on the panel, rather than leaving their representation to chance. Nowhere do we suggest that every panel member should have every necessary skill.

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# Major Contributors to This Report

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