An assessment of the Department of Finance and Administration (DoFA) model of program evaluation for Australian government communication campaigns: A social marketing perspective.

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Abstract
The issue of government communication campaigns is currently generating a great deal of attention from academics, public policy makers and stakeholders. The Australian federal government recommends that departments use the Department of Finance and Administration (DoFA) framework for program evaluation. Since its introduction in 1994 this framework has been used with little review or regard to the changing environment surrounding its use. Therefore, this paper raises the emerging question: is the DoFA program evaluation model adequate and effective in achieving the goals set for this purpose? The findings of this exploratory research suggest that the paucity of data on wider social parameters calls into question the overall appropriateness and effectiveness of the DoFA model for campaign evaluation. The paper identifies the methodological and transparency limitations of the available data and identifies the future research potential in this field.

Introduction
The issue of Government public communication campaigns is attracting renewed attention in Australia (Young 2007, Kiely 2007). There is increasing interest within the community relating to public accountability and transparency for Australian government communication campaigns (The Democratic Audit of Australia 2008, Senate report on Government advertising and accountability 2005).

In 2006/7 the Australian Government spent $220 Million on advertising in the mass media (B&T 28 March 2008 p28). A significant proportion of the $127million per annum advertising expenditure commissioned by the Australian government is directed towards goals identified as social marketing (Grant 2004). If it was one company, the Australian Government would be the largest enterprise purchasing mass media advertising and public relations services.

The Australian Government has recommended that departments use the Department of Finance and Administration (DoFA) evaluation model (1994) to monitor the elements of government policy initiatives. The DoFA guidelines also cover the evaluation of government advertising and public relations activities that support broader program aims.

There is some evidence of non compliance by departments and agencies with the DoFA evaluation guidelines. A routine part of the reporting mechanism for the DoFA evaluation protocols was provision of summary reports known as Program Evaluation Plans (PEP). Di Francesco (1996) reported that in only five out of 18 government departments provided PEP reports to DoFA that year. The PEP reports were subsequently abandoned in 1999 and evaluation was left to the Departments to administer within the overall aegis of the DoFA guidelines.

Both the Office of Government Information and Advertising (OGIA) until 1998 and the Government Communication Unit (GCU), have recommended that departments allocate up to 10% of their campaign budget to the research and evaluation of the promotion campaigns. However, the last time data was publicly available Charlton (1996) reported that only a small
number (13%) of all communication projects considered by the Ministerial Committee on Government Information and Advertising (MCGIA) were classified as research and evaluation and only 3% of the total budgets of all campaigns considered by the committee was devoted to research.

From a public relations industry perspective the government non-compliance is not surprising. Research conducted for the International Public Relations Association (IPRA) found that while 90% of Australian public relations practitioners surveyed agreed that evaluation was necessary, 95% agreed that it was more talked about than done. Only 14% frequently undertook evaluation research (IPRA Gold Paper 11, 1994).

In examining Canadian public sector communication campaigns, Rose notes, “empirically gauging the success of the campaign is possible, but it is also a methodological minefield... Measuring the effectiveness of any advertising campaign is one of the most difficult issues to resolve and one that is fraught with methodological problems. This is so because, in part, the producer and consumer of advertising campaigns have a vested interest in the outcome.” (Rose 2000, P148.)

In view of the lack of compliance and methodological issues in the above discussion, a question should be raised “Can a model of public communications evaluation, be developed, which would be most appropriate for public sector agencies?” We will argue that the DoFA model and the evaluation measures the government applies are inadequate for measuring most complex and ambiguous public policy initiatives. The development of a normative model to support and enhance the evaluation of government marketing initiatives is part of a larger exercise and is the subject of the lead author’s PhD research.

An Evaluation of the DoFA Framework

An explanation of the elements of the Department of Finance and Administration (DoFA) Model of Program Evaluation is presented in the next section and this will be followed by some discussion and recommendations.

**Department of Finance Model of Program Evaluation**

![Diagram](image)

**Appropriateness**- This measure is quite difficult to evaluate without indulging in some polemic. Departments usually rely on the extent to which program objectives/desired outcomes align with government priorities/policy and client needs. Generally this is evidenced by the program having political support and funding. According to the Public...
Service Act 1999 and the Financial Management and Accountability Act 1997 there should be no problem for departments to engage in communication activities. Deriving a measure for this element for this part of the model requires a normative and possibly value driven set of protocols. One example of the challenge in deriving a measure for appropriateness in an evaluation protocol is a cursory examination of the 1995-1997 Workchoices Campaign. The then head of the ACTU Greg Combet unsuccessfully challenged the legitimacy of the $55 million Workchoices campaign in the High court of Australia (Senate report on Government advertising and accountability, Chapter 4, 2005). The Unions conducted their own advertising campaign combating the Workchoices message controversy. There was both press and citizen commentary via political blog sites. (Leigh 2005, at Online.opinion.com.au and Sparrow 2007, at Crikey.com.au). It is possible that the Workchoices campaign and resistance to it was instrumental in the community being galvanised against the incumbent government and consequently a change in government.

**Effectiveness**- this involves evaluation of both the interventions and the communication campaign activities. This is the extent to which program outcomes are achieving program objectives.

**Cost Effectiveness**- refers to the relationship between inputs and outcomes expressed in dollar terms. Cost Effectiveness might require a set of formative and process assessments such as setting performance benchmarks for awareness, attitude change as well as behaviour change and be measured by a set of metrics established in a randomised trial.

**Efficiency**- denotes the extent to which program inputs are minimised for a given level of program outputs, or to which outputs are maximised for a given level of inputs. Each campaign would normally be coordinated under the GCU guidelines (1995-2007). These ensure that media schedules booked and purchased are value for money, take account of properly identified target audiences, and provide an audit to ensure that the ads actually appear. In accordance with the GCU guidelines, departments could spend up to 10% of the campaign budget to use commercial campaign evaluation techniques. This may involve assessing recall and aided recall of advertising and some pre-testing of advertisements for salience and message take out. Long term attitudinal and behavioural change would be assessed with tracking research in a longitudinal study similar to the Department of Health’s Anti smoking campaigns (1997-2004). We argue that a fully integrated and socially responsive framework would take into account a broader mix of policy settings, rather than just the viability of an industry sector.

**Discussion**

Not all communication campaigns include research on the full impacts of the policy, even within the limited DoFA evaluation framework. Possible indicators of community acceptance are the number of complaints lodged or the level of public comment. The authors maintain that such ‘externalities’ are directly relevant to the campaign, and thus, to its evaluation.

One challenge in examining the DoFA model is the lack of publicly available information about campaigns and their evaluations. The results are not routinely reported on in any publicly available documents or websites. The main alternatives are the limited data available from departmental websites or laborious, or the time consuming and expensive provisions of (FOI) requests under the Freedom of Information Act 1982, along with examining the proceedings of Senate Estimates Committee hearings and departmental annual reports. Problems with Australia’s FOI provisions have been widely acknowledged as an obstacle to
democratic process (O’Brien, 2005), and problems of accountability of government social marketing campaigns may be viewed as a dimension of wider democratic functionality.

The DoFA framework is currently the only model accepted for program evaluation within the Commonwealth Government. Thus, it is not relevant to compare it with other officially recognised models of social marketing or advertising effectiveness, although these would inform a revised model.

None of the sources available for public scrutiny, primarily departmental web sites, the GCU and published documents, provide comprehensive evaluation data in anything resembling the integrated fashion required by the DoFA framework. Unlike the commercial sector, publicly responsive integration requires high levels of transparency. Even though the DoFA model includes ‘community needs’ as an element in the planning process, evidence of wide consultation or background research is seldom publicly available. Government priorities also are often simply stated with little research or modeling on possible unintended consequences. The researchers, along with many other former public servants, can attest that campaigns are often driven by party room politics. No one, of course, considers this to be news. The challenge is to put in place systems for articulating public policy goals and measuring their impacts in ways that maximize the potential for scrutiny.

Another limitation of the DoFA model is the short term perspective. Typically, wider public policy outcomes are left to non-government and industry players to measure, track and comment on. However, these activities stand apart from the formal evaluation process.

Geiselhart (1996) suggests that accountability should include transparency, responsiveness, and evaluation, as well as cost-effectiveness. The first three elements are measures of meeting social goals; the last a financial safeguard. Thus, accountability = social goals met + cost effectiveness, where social goals are measured in terms of responsiveness, transparency, and evaluation. This is the direction the authors would like to see for a revised DoFA framework. The challenge for truly accountable social marketing campaigns is to align policy appropriateness with responsive public outcomes.

The DoFA model focuses narrowly on evaluation measures which are internally responsive only. There is currently no provision in the framework for ‘completing the circle’ by taking into account integrated community goals in measures of program effectiveness. One outcome of this classic fragmentation approach is that individual campaigns may be quite successful according to the DoFA framework. However, a more holistic look at the social outcomes suggests that results may be far less clear cut, and can reveal counter-productive impacts.

Proposals for greater lateral and public responsiveness for Australian federal government communications lie outside the new framework for public sector accountability. The provisions of the Government Advertising (Objectivity, Fairness and Accountability) Bill 2000, the Public Service Act 1999 and the Financial Management and Accountability Act 1997 clearly place accountability with the Minister only but not with the public. However, public responsiveness has been a key element of public sector reform over the past decades suggesting that there is a conflict between democratic and political accountabilities. However, the politicisation of the public sector communications function is beyond the scope of this paper. It is interesting to note that the GCU, the government communication coordinating agency located in the Department of Prime Minister and Cabinet, was closed down in December 2007. The responsibility for government advertising now lays directly with Senator John Faulkner the Special Minister of State.
Limitations and future research

This paper focuses on the current DoFA model for evaluation of federal government programs. State and Local Government, as well as non-government organisations’ may have similar social marketing objectives but have different legislative frameworks for evaluation and transparency and are beyond the scope of this paper.

Another limitation is the difficulty of identifying the attitudinal or behavioural effects resulting from communication campaigns as distinct from the effect of other interventions, such as education, legislative change and enforcement. The problem of forensically isolating the effect of all marketing inputs is also a problem for commercial marketing. The distinction here is that Governments can enforce behaviour change. A discussion of this issue has been explored in social marketing literature (Rothschild 1999).

Future studies could track campaign programs by including broader accountability parameters that may provide early evidence of undesirable externalities associated with a particular campaign. This might also identify effects from competing policy interventions.

Conclusions

The DoFA framework can integrate a range of evaluation criteria with regard to communications programs, but falls short on mechanisms to ensure that wider social goals are being met. Thus, unintended or counter-productive outcomes may be produced without alerting policy-makers to the need for subsequent efforts to address them. Short termism and fragmentation, along with wastage of precious tax funds, may be entrenched. The public service has adopted the rhetoric of client focus but without the necessary transparency and participation which is protected by their legislative imperatives. These are considered as essential elements for publicly accountable social marketing campaigns. The difficulty of public access to evaluation data is just one indicator that greater transparency of the process for the campaign evaluation framework is needed.

The ‘appropriateness’ element of the DoFA evaluation model appears not to fully capture the notion of ‘accountability’. It addresses the general question, ‘was the campaign commissioned in line with government policy objectives?’ Subsequent adaptation of the DoFA framework will be undertaken to focus more on establishing who undertakes the evaluation, and to whom this is reported, in addition to the effectiveness and efficiency criteria to complete the circle of accountability to the public, via the evaluation reported of government campaigns. This would enhance and complement effectiveness and efficiency criteria.

Each evaluation needs to be designed specifically for the circumstances of the campaign, and take into account the pressures and events of that time and place. However, without losing sight of this need for flexibility, the program evaluation model proposed by the DoFA for the Australian government context provides a fairly sound basis for beginning the long process of collecting information, which will enable practitioners to predict and assess the effectiveness of their activities. The next question therefore arises as to whether or not a formal model of evaluating public communications as such has been developed, and if so, how compatible that model might be with that proposed by DoFA.

We conclude that the DoFA framework is inadequate to cover social accountability requirements. The DoFA framework would be strengthened by incorporating additional...
elements of public input and reporting throughout all stages of the campaign. This would assist cost-effectiveness by alerting campaign developers to emerging unintended consequences, at a point when modification is still possible. It would also help to ‘close the loop’ in the DoFA framework.

References


