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133VOCATIONAL REHABILITATION

Vocational rehabilitation is a critical part of the treatment process, since society's objective of altering the drug-using lifestyle of a former addict is clearly linked to his ability to find and hold a job. A job not only enables one to be self-supporting, it enhances the dignity and self-reliance that people need to be responsible members of society.

Treatment services targeted at interrupting the abuse of drugs are an important first step. To complete the process and insure against the likelihood of return to drug use we must provide the abuser with the emotional stability and technical skills he needs for survival. At present, the rehabilitation needs of drug abusers are not being adequately met. For example, CODAP* data for the period ending September 30, 1974, indicated that 30 percent of clients in treatment were employed full-time; 5 percent employed part-time; 4 percent were in training programs, and 12 percent were in education programs. But, 49 percent of clients in treatment were not involved in any form of employment, educational or training activity at all.

* Client Oriented Data Acquisition Process



A further example of the lack of success in rehabilitation is depicted in Chart 19 below, which shows the vocational status of patients entering treatment and leaving treatment from January 1 to March 31, 1975.

Chart 19

EMPLOYMENT AND EDUCATION STATUS OF CLIENTS

| % of Clients | <u>Employed Full-Time</u> | <u>Employed Part-Time</u> | <u>In School</u> | <u>In Skill Development</u> | <u>None of the Named Activities</u> |
|-----------------|---------------------------|---------------------------|------------------|-----------------------------|-------------------------------------|
| when admitted | 19.64 | 5.23 | 20.67 | 3.84 | 50.62 |
| when discharged | 20.26 | 6.10 | 17.61 | 4.40 | 51.63 |

(Source: CODAP Report June 1975)

These data are imprecise since they deal with different groups of people. But the story they tell is distressing: there may be no discernable improvement in the employment and educational status of patients during their period of treatment. Either the treatment system, or the rehabilitation system, or both have missed an important opportunity.

Treatment programs themselves are usually not equipped to provide clients with the skills training and educational services needed to prepare for employment. These rehabilitation services have not been built into the

treatment system, since they are available through State and local rehabilitation programs. However, the availability of such services ~~to drug abusers~~ depends upon the willingness of local and Federally funded rehabilitation service programs ^{SERVICES} to provide them to drug users, and the willingness of private and public employers to hire them. Unfortunately, in far too many cases, this cooperation is lacking.

To encourage more effective cooperation and collaboration between drug abuse treatment programs and the rehabilitation and employment service agencies, the task force recommends the following:

1. Establish a vocational rehabilitation subcommittee under CCDAP* with representation from the Department of Labor, Rehabilitation Services Administration (RSA), Veterans Administration, Social and Rehabilitation Service, and NIDA to develop a strategy to review current program regulations and guidelines, State plans, and special initiatives of relevance to the long-term rehabilitation of drug abusers. This subcommittee should (1) develop joint research and demonstration projects to improve the delivery of rehabilitation and employment services to drug abusers, and (2) develop strategies for involving the private sector in the employment and rehabilitation of drug abusers.
2. Establish and implement a DHEW policy that RSA, in cooperation with NIDA, will formally encourage State vocational rehabilitation agencies to provide rehabilitation services to drug abusers. While the legislation and regulations governing State vocational rehabilitation programs clearly state that no individuals or groups may be excluded because of their

* Cabinet Committee for Drug Abuse Prevention, discussed in Chapter 5.



disability, the fact is that in RSA no current emphasis is placed on the provision of services to drug abusers. The regulation which states that no individual or group may be excluded because of their disability should be strictly enforced in connection with drug abusers.

3. Encourage drug abuse Single States Agencies and treatment programs to seek cooperative agreements with manpower and vocational rehabilitation agencies by strengthening the drug abuse State plan regulations to require substantive joint activity. Emphasis should be placed on establishing mechanisms to provide for referral of clients requiring employment oriented services and on requiring joint State and local planning to provide a full range of services to drug abusers.
4. NIDA and the Department of Labor should review all regulations to ensure that they do not impede the provision of rehabilitation services to drug abusers. This applies to the NIDA confidentiality regulations as well as vocational rehabilitation regulations.

INTERFACE WITH THE CRIMINAL JUSTICE SYSTEM

Studies have repeatedly shown that most high priority drug users have a history of repeated involvement with the criminal justice system. This involvement may be an arrest for possession or for a "habit-supporting" crime such as larceny. Or, it may be for offenses entirely unrelated to drug use. Whatever the reason, these arrested drug users are prime candidates for treatment since the arrest and subsequent criminal justice procedure provides an opportunity to detect and monitor their drug-using behavior, and to encourage their participation in a treatment program. Therefore, development of systematic



linkages between the treatment and criminal justice system is critical.

Ideally this linkage would encompass everyone who comes into contact with Federal or State criminal justice systems for any significant period of time and would operate from the time of arrest until final discharge from the correctional system. Current programs begin to meet this requirement, but are limited in scope and geographic coverage. Further, relationships between treatment and criminal justice agencies have often been impeded by procedural obstacles, mutually shared suspicions and inadequate coordination.

The Federal Government currently sponsors programs to improve these linkages for both Federal and State offenders. Below, the task force recommends new initiatives for both Federal and State offenders.

Federal Offenders: Pre-Trial

While there are no existing programs which screen people entering the Federal criminal justice system for drug abuse, the recently passed Speedy Trial Act of 1975 (STA) may provide the vehicle to develop an identification and referral program.

Title III of the STA provides for the establishment of pre-trial service agencies on a demonstration basis in ten Federal judicial districts. In these pilot projects,



all arrestees are to be routinely screened to determine if they have a history of drug abuse or are currently using drugs. Recommendations are to be made to the judicial officer, who can place the defendant under supervision of the pre-trial services officer. This pre-trial services officer then can assist the defendant in securing any necessary drug treatment, employment help, medical or legal services.

The Speedy Trial Act is an important step in the right direction, but it has some limitations. While mandatory urinalysis for all offenders may not be feasible, the program should develop an efficacious means of identifying drug-abusing criminal offenders and referring them for treatment services. Further, activity under STA applies only to those arraigned and pending trial, and does not deal with others who voluntarily or involuntarily come in contact with the system through investigation or arrest and release. Finally, the ten cities pilot provides no assurance that programs will be developed in all Federal judicial districts.

If the results of the first ten pilot projects are good, the task force recommends prompt expansion of the program.



Prisoners and Parolees

The Bureau of Prisons (BOP) provides drug-free inpatient treatment to certain opiate-dependent offenders. The incare program consists of 21 treatment units in 16 Federal correctional facilities throughout the United States, currently accommodating approximately 2,000 prisoners. The Bureau also contracts for community care programs for Federal parolees and probationers.

Once Federal offenders are released from prison they are supervised by the U.S. Probation Office, an agency of the judicial branch of government. Persons who could benefit from drug treatment may be referred to community treatment programs either on a voluntary basis, or as a condition of parole. When drug treatment services are required, these services are paid for by the Bureau of Prisons even though the U.S. Probation Office by law must maintain supervision, responsibility and primary contact with the treatment organization.

This cumbersome arrangement should be modified to improve the administration of payments for treatment services for parolees and probationers. The task force therefore recommends that funds and responsibilities be transferred from BOP to the U.S. Probation Service, and that the U.S. Probation Service



← be made pay agent for treatment services for Federal parolees and probationers.

Another problem area with Federal parolees is the apparent resistance of the courts and BOP to the use of methadone maintenance. Ninety-five percent of drug using prisoners are opiate abusers, yet only two percent of those persons who get treatment while on parole receive methadone. The need to have access to a wide variety of treatment approaches has been established, and methadone maintenance has proven useful in treating opiate addiction. Therefore, the task force recommends that the courts and BOP accept methadone maintenance as a proper treatment alternative.

State Offenders

Many drug-using offenders come into contact with the criminal justice system at the State level. The main Federal role in these cases is to encourage the State and local law enforcement agencies to utilize treatment processes in conjunction with or in lieu of prosecution and jail, and to provide assistance for this purpose. The task force recommends that priority in Federally funded treatment be given to criminal justice offenders who desire to participate. Further, the task force strongly encourages State and local governments to develop more comprehensive criminal justice treatment programs, drawing upon existing models. It is further

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recommended that NIDA encourage Single State Agencies and State Planning Agencies to develop joint programs providing greater cooperation in this area.

At the present time, the major Federally sponsored program for referring State and local criminal offenders to community based treatment programs is Treatment Alternatives to Street Crime (TASC). Its goal is to decrease the incidence of drug-related crimes with their attendant cost to the community by interrupting the drug-driven cycle of street crime - arrest - jail by providing treatment. TASC identifies drug abusers in the criminal justice system, refers them to proper treatment, and monitors their progress.

TASC has established projects in 26 major metropolitan areas, with 4,000 clients presently in treatment; over 15,000 have been referred since August 1972. Of the clients referred under TASC, over half were receiving drug treatment for the first time.

Under present policy, each TASC project may receive a maximum of two or three years of LEAA discretionary funding. After this period, each project must seek local and/or State continuation funding. One project has completed its LEAA funding period and is being funded by State block grant funds. Three additional projects whose Federal support ends in January 1976 will be

continued by non-Federal funding. It is anticipated that most of the remaining Federally funded TASC projects will secure State and/or local funds despite the present economic situation.

The task force recommends that the TASC project be expanded to include any jurisdiction with a population of 200,000 or more that can satisfactorily demonstrate eligibility. The task force also recommends that TASC funding over the next several years be maintained at its present level of approximately \$4 million per year. As older projects complete their period of Federal funding, monies will be available for new starts. Increased efforts should also be undertaken to secure continued funding of all successful TASC projects from LEAA State Planning Agencies.

Summary

Current programs for Federal offenders are limited in scope (i.e., focusing primarily on parolees) and geographic coverage, and are functioning under obsolete



legislation.* Moreover, there is presently no comprehensive Federal guidance for State and local agencies who seek to establish programs more flexible than TASC. Development of comprehensive programs for providing drug treatment to all criminal offenders who need it should be given the highest priority.

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- * The Narcotic Addict Rehabilitation Act of 1966 (NARA) is outmoded. For example, under Title I, persons charged with certain Federal offenses are eligible for civil commitment in lieu of prosecution. However, this cumbersome procedure has been infrequently invoked since its enactment, and has become obsolete in terms of contemporary treatment approaches.

Title III of NARA provides Federally funded treatment for persons who voluntarily present themselves to the U.S. Attorney and request these services. Often such persons "voluntarily" request such commitment in return for dismissal of criminal charges by local prosecutors. The task force recommends that Title III be terminated. Title III provided treatment at a time when there was no established network of community based treatment services in the country. However, today NIDA has established a nationwide treatment network through funding of staffing grants, drug abuse service project grants, State-wide service contracts and formula grants, and currently maintains 95,000 treatment slots.

Thus, there no longer exists the basic need for Title III of NARA. In fact, utilization of Title III slots has showed a dramatic decrease from almost 2,000 clients in 1971 to 265 clients for the same period in 1975. The money saved from the more expensive NARA slots (\$2940 per slot for NARA vs. \$1640 for NIDA) could be used by NIDA to supplement grants in those treatment areas that do not have room for additional clients.



Accordingly, the task force recommends that an inter-departmental committee on the drug user and the criminal justice system be established under the Cabinet Committee on Drug Abuse Prevention. This committee should:

- . Develop alternative models for treatment in lieu of and in conjunction with criminal justice processing from the time of arrest through final discharge.
- . Develop minimum standards on these matters as guidelines to be employed in connection with the funding of State and local programs by both LEAA and NIDA.
- . Draft new legislation for the treatment of Federal offenders encompassing the entire process from arrest through final disposition; this legislation would replace NARA and other obsolete legislation and would provide a model for parallel State and local efforts.

A progress report should be completed by March 31, 1976.

RESEARCH, DEMONSTRATION
AND EVALUATION

Since 1971, drug abuse research has received increasing priority, with higher levels of resources available and major national capability created in the field. Funding over the past five years has totaled \$244 million, as shown below.



Funding (Millions of Dollars)

| | <u>1971</u> | <u>1972</u> | <u>1973</u> | <u>1974</u> | <u>1975</u> | <u>TOTAL</u> |
|-------|-------------|-------------|-------------|-------------|-------------|--------------|
| NIDA | 14.3 | 28.6 | 39.3 | 54.2 | 48.4 | 184.8 |
| OE | 4.2 | 4.6 | 3.0 | 0.2 | 0.5 | 12.5 |
| DEA | na | 3.7 | 3.3 | 7.8 | 5.7 | 20.5 |
| VA | 0.3 | 0.6 | 2.0 | 1.0 | 1.3 | 5.2 |
| DOD | 0.0 | 3.4 | 6.6 | 4.8 | 4.9 | 19.7 |
| TOTAL | 18.8 | 40.9 | 54.2 | 68.0 | 60.8 | 242.7 |

This research program has led to significant advances in our understanding of drug abuse, particularly in methods of detecting drugs, in measuring the extent of drug abuse and the abuse potential of various drugs, and in the pharmacology of methadone and other chemotherapeutic alternatives for treating narcotic addiction.

In developing a research strategy for the future, two principal areas should be addressed:

- Research priorities; and
- Research management

Research Priorities

There currently is no broad agreement on Federal priorities for research. Yet, the need for greater attention to evaluating the relative effectiveness of different drug abuse prevention, treatment, and rehab-



ilitation approaches is obvious. In order to properly allocate Federal dollars in the future, it is critical that we know what works and what doesn't, for whom it works and under what conditions. This determination requires in-depth follow-up studies on the progress of clients during and after treatment. Identifying what prevention and treatment programs work best should be the number one research priority.

Other high priority areas for research and evaluation include determining:

- . What causes a person to turn to drugs: what leads certain individuals into serious drug abuse problems while others avoid them.
- . What treatment systems seem to do better in terms of decreasing drug use, decreasing crime, increasing employment, etc.
- . What effect different treatment systems have on the behavior of clients, as contrasted with their pre-treatment behavior.
- . How the behavior of clients changes during treatment and after release into society.
- . Whether characteristics of a clients' profile at admission can be predictors of probable success in one type of treatment vs. another type.
- . What treatment methods work best for each type of client. Clients could then be immediately referred to a particular modality based on the information compiled in their client profile studies.



Research Management

Because of the rapid expansion of research activities and the differences between individual agency missions, there is no mechanism for coordinating research across the various Federal programs, no systematic long-range planning to derive the maximum benefit from research activities, and little dissemination of available results between Federal agencies. Since all Federal research is aimed at basically the same objective, there is obviously a need to integrate and coordinate the overall Federal research, demonstration and evaluation (RD&E) effort.*

To insure that the required coordination among agencies involved in RD&E is achieved, a single agency must have overall responsibility for Federal RD&E planning. The obvious choice is NIDA, since NIDA is the major funding source of Federal RD&E in drug abuse, with a FY 1975 budget representing over 80 percent of the entire Federal effort. NIDA is involved in all areas of basic research in drug abuse, and has a strong capability in applied research, demonstration and evaluation. Because of the predominant size of its research program, we recommend that NIDA first formulate an overall plan for RD&E in consultation

* This does not negate the need for specific research efforts by agencies which are targeted toward a given population or agency activity, such as Department of Defense research focusing on the drug problems of servicemen.



with other agencies involved in the RD&E function. Then other agencies should develop their specific plans in a way that supplements, rather than duplicates, NIDA's program.

Further, in order to coordinate the development of an integrated RD&E program, the task force recommends that an interagency research committee be established under CCDAP. The committee should be composed of the heads of research activities at NIDA, the Office of Education (HEW), the National Institute of Mental Health (HEW), the Drug Enforcement Administration, the Department of Defense and the Veterans Administration.

INTERNATIONAL DEMAND REDUCTION

During the past few years, the Federal Government has markedly increased its participation and support of international drug abuse demand reduction programs.

Further action is required in three major areas of international demand reduction:

- Providing drug abuse prevention and treatment services for official American citizens residing abroad. The Department of State should continue to be the agency with primary responsibility for providing treatment services for official Americans and their dependents living abroad in the high-risk areas of drug abuse. In performing this mission, the Department of State should seek technical assistance and advice from NIDA.



Programs run by the United States overseas provide additional benefits by serving as on-site demonstration projects for various types of treatment, by facilitating the exchange of information, and by displaying the most up-to-date approaches to drug abuse demand reduction for host country professionals and government officials.

- Providing advice and technical assistance to foreign governments and international organizations. Under the CCINC aegis, NIDA should provide teams of consultants to those countries which request U. S. assistance in developing demand reduction plans and programs.
- Formulating general international drug abuse prevention and treatment policy. The Treatment Subcommittee of the CCINC should be activated to improve this function and a NIDA representative made Chairman.

The following specific objectives should be pursued by the United States in its effort to reduce domestic drug abuse through prevention programs among foreign governments. We should:

- Assist foreign governments to estimate the scope of drug abuse problems in their country.
- Assist foreign governments in developing programs offering alternatives to drug abuse.
- Encourage and assist foreign governments to undertake and share the results of research on the extent, causes, treatment and prevention of drug abuse.
- Call to the attention of appropriate foreign governments their obligations under Article 38 (as amended) of the Single Convention on Narcotic Drugs, which requires international coordination of demand reduction activities.
- Continue to support the United Nations Fund for Drug Abuse Control and strengthen our bilateral efforts, both to respond to requests from other governments and to stimulate selectively those requests which will further U.S. interests.

In summary, cooperative demand reduction programs serve to bring to the attention of other countries their own drug abuse problems. This recognition that drug abuse is a problem which affects all nations will help to encourage international cooperation in reducing drug abuse.

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5 - PROGRAM MANAGEMENT

The Federal program to control drug abuse is composed of activities as diverse as any in government: crop substitution in the mountains of northern Thailand; drug treatment centers in over 2,000 locations; research on the pharmacology of drugs; cooperative law enforcement with police forces in over 40 foreign countries; Defense Department urinalysis testing; and patrolling thousands of miles of border to prevent illicit smuggling -- to name just a few. In fact, the Federal effort to simultaneously reduce the supply of and demand for illicit drugs involves seven Cabinet departments and seventeen agencies.*

Clearly, strong coordinative mechanisms are necessary to ensure that the efforts of these departments and agencies are integrated into an effective overall program, and that the approach adopted in each is consistent with the President's priorities. This need was quickly recognized when drug abuse first became a high priority program in the early 1970's. A variety of permanent and temporary offices were created to provide policy guidance, program oversight, and interagency coordination of the rapidly expanding program. These

* *SERVICES* Departments of State, Defense, HEW, Justice, Treasury, Labor and Agriculture; AID; CIA; Veterans Administration; NIDA; FDA; Social Rehabilitation Service, Rehabilitation Systems Administration; and Office of Education in HEW; DEA, LEAA, Immigration and Naturalization Service, and Bureau of Prisons in Justice; Customs, and Internal Revenue Service in Treasury; and OMB, NSC and the Domestic Council in the Executive Office of the President.



included:

- . The Cabinet Committee on International Narcotics Control (CCINC), created in 1971 to coordinate the international control program.
- . The Special Action Office for Drug Abuse Prevention (SAODAP), created in 1971* to oversee and coordinate the development of a comprehensive treatment and prevention program to balance the existing law enforcement program.
- . The designation of the head of the Justice Department's Office of Drug Abuse Law Enforcement (ODALE) as Special Consultant to the President for Narcotics Affairs in 1972.
- . The creation of a special drug abuse staff within the Domestic Council.

As the drug program matured, many of these temporary offices were replaced with more traditional and stable structures. By mid-1973, the specialized Domestic Council staff had evolved into a small office in the Office of Management and Budget (OMB), and the executive directorship of CCINC had been transferred to the State Department's Senior Advisor for Narcotic Matters (S/NM). In July 1973, ODALE was merged with the Bureau of Narcotics and Dangerous Drugs, the Office of National Narcotics Intelligence, and with U.S. Customs Service officers involved in drug investigations to create a new Drug Enforcement Administration (DEA) in the Department of Justice; and

* By Executive Order: legislation followed in 1972.

the Attorney General was given overall responsibility for drug law enforcement. Finally, by early 1974, the permanent successor to SAODAP -- the National Institute on Drug Abuse (NIDA) -- was established in HEW. Over the next 18 months, NIDA gradually assumed most of SAODAP's functions, allowing SAODAP to expire as scheduled on June 30, 1975.

Thus, a steady decrease in direct Executive Office involvement paralleled the assumption of authority by the lead agencies in the drug field: NIDA for prevention and treatment; DEA for law enforcement; and the State Department Office of the Senior Advisor (S/NM) for international activities. The Administration's goal was to develop effective management within each of the three segments of the Federal drug program and, as their management capacity increased, to gradually reduce direct Executive Office involvement.

The task force strongly endorses this concept, but recognizes the continuing need for program oversight and limited interagency coordination at the Executive Office level. The recommendations which follow are designed to strengthen the management capabilities of the lead agencies concerned with drug abuse, and to provide better coordination of the overall drug abuse prevention effort.

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The task force recommends four basic actions:

(1) revitalization of the Strategy Council on Drug Abuse to provide overall policy guidance; (2) creation of a Cabinet Committee for Drug Abuse Prevention with an active subcommittee structure to continue the coordination of prevention and treatment activities formerly provided by SAODAP; (3) continuation of a small staff in the Office of Management and Budget to provide assistance to the Strategy Council and the Executive Office; and (4) development of an integrated data analysis capability. Each of these recommendations is discussed below.

REVITALIZATION OF THE
STRATEGY COUNCIL

The Strategy Council on Drug Abuse was established in 1972 to develop an annual strategy statement which would provide an assessment of the drug abuse problem in the United States, a plan for a comprehensive Federal response, and an analysis of the major programs conducted in drug abuse prevention and drug traffic prevention.*

* Membership includes the Secretary of State, the Secretary of Defense, the Attorney General, the Secretary of Health, Education and Welfare, and the Administrator of Veterans Affairs.

In addition to continuing to develop the Federal Strategy,* the task force recommends that the Council's responsibilities be expanded to include the following functions:

- . To offer a forum for policymakers which spans both drug abuse supply and demand activities, in order to resolve major policy issues.
- . To provide coordination between supply and demand reduction programs, and to ensure that resources are allocated in a manner which strikes the optimal balance between these complementary aspects of the program.
- . To advise the President, Vice President, and other key Executive Office personnel on the status of drug abuse in the United States.
- . To monitor progress in implementing task force recommendations as presented in this white paper, and to report progress to the President by March 31, 1976.

In order to ensure that the Strategy Council is sufficiently broad in its outlook (i.e., able to maintain a perspective which balances supply and demand reduction activities, and to integrate drug abuse with other national goals and programs), the task force recommends that the Assistant to the President for Domestic Affairs be added to the Council and designated as Chairman.

* In the past, publication dates have varied. The task force recommends that in the future the document should be published on June 30. To facilitate preparation of the book, the Council may require departments and agencies engaged in the drug program to submit information and reports necessary to assure a comprehensive document.

Further, the task force recommends that the Secretary of the Treasury also be added to the Strategy Council, in view of the important roles played by the U.S. Customs Service and the Internal Revenue Service in the overall drug program.

CREATION OF A CABINET COMMITTEE
ON DRUG ABUSE PREVENTION

Coordination among agencies involved in drug abuse demand reduction was the responsibility of SAODAP prior to its expiration. A consistent theme which emerged in each of the functional working groups on the demand side of the task force review was that the need to coordinate Federal drug abuse prevention activities remained, and that interagency coordination should in fact be strengthened beyond that which had existed under SAODAP.

To meet this need, the task force recommends that a new Cabinet Committee on Drug Abuse Prevention (CCDAP) be created, and that the Secretary of the Department of Health, Education and Welfare be named Chairman. We believe that this recommendation is fully consistent with the President's often-stated goals of lodging operating responsibility in the appropriate



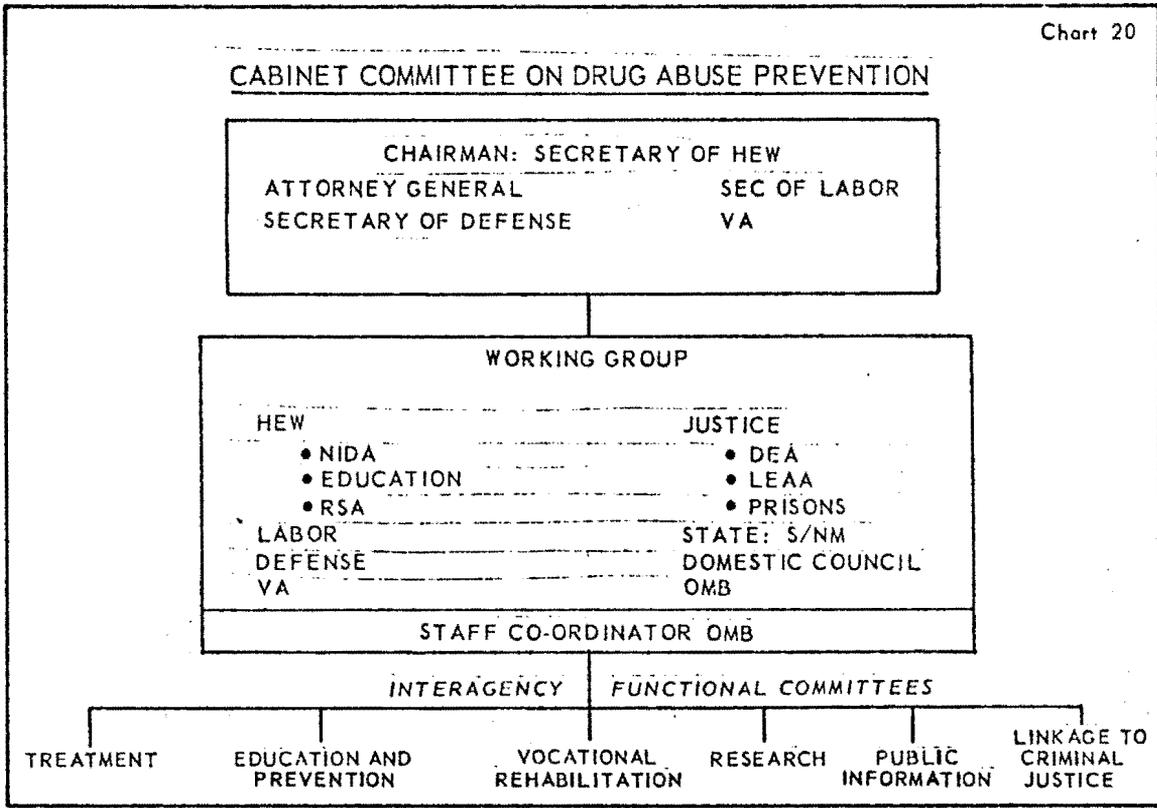
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Cabinet departments, and of holding Cabinet officers responsible for improving the Federal Government's response to critical national problems. The membership of the CCDAP should include:

- . The Secretary of HEW, Chairman
- . The Secretary of Defense
- . The Secretary of Labor
- . Administrator, Veterans Administration
- . The Attorney General

The task force further recommends that the Secretary of HEW appoint an Executive Director of CCDAP who would serve as chairman of an assistant secretary level working group. Finally, the task force recommends the creation of a series of interagency functional groups to provide detailed coordination below the level of the working group.*

Chart 20 illustrates one possible structure for CCDAP.



* The task force's model is the CCINC, which has been quite successful in providing interagency coordination of the international program.

CCDAP should be charged with the following responsibilities:

- . Prepare annually a government-wide assessment of drug abuse demand program requirements in treatment, rehabilitation, research, demonstration, evaluation, and information systems, to be submitted to the President.
- . Maintain and publish semi-annually a report on the status of drug abuse in the United States.
- . Provide overall policy direction for, and coordination of, Federal drug education and prevention, treatment, vocational rehabilitation, research, and training programs.

The Executive Director of CCDAP should be given the following responsibilities:

- . Act as public spokesman for the Federal Government on overall drug abuse prevention programs and the status of drug abuse;*
- . Provide leadership in planning and coordinating drug abuse prevention with other Federal programs;
- . Encourage departments and agencies whose primary mission is not drug-related to place high priority on drug abuse prevention and the treatment needs of their constituencies.
- . Advise the Secretary of HEW on drug abuse prevention programs, policies and priorities.

The creation of this Cabinet Committee will give HEW, Alcohol, Drug Abuse, and Mental Health Administration (ADAMHA), and NIDA the organizational strength and authority to provide the interdepartmental and interagency coordination needed to maintain the progress which has been made in drug abuse treatment and prevention.

- * Individual agency heads would continue to speak for their own specialized programs.

In addition, the task force has proposed a number of internal organization and management changes to strengthen NIDA's ability to carry out its expanded responsibilities. Among the most important are (1) assignment of a full time legal counsel; (2) establishment of an Office of Communications and Public Affairs; (3) delegation of greater authority by ADAMHA and HEW; and (4) improvements in contract grant procedures.

The task force recommends that DEA continue its corresponding lead agency role regarding law enforcement and regulatory programs, as designated by Executive Order No. 11727. In the course of this review, the task force noted several opportunities to improve DEA's ability to fill this lead agency role through improvements in internal management; these have been discussed with the Administrator and the Deputy Attorney General. However, since the task force has already recommended that the Attorney General and the Secretary of the Treasury report to the President by December 31, 1975, concerning their recommended program for improving coordination of drug law enforcement activities, the task force has not recommended a specific coordinating mechanism for supply reduction activities.

CONTINUATION OF A SMALL EXECUTIVE OFFICE STAFF

The actions already discussed will play the an important role in helping assure greater policy guidance and interagency coordination. Nonetheless, the task force believes that there is a continuing need for a limited Executive Office staff for some period of time to provide



coordination and policy guidance during this transition period. Accordingly, the task force recommends that an Executive Office staff, consisting of 3 to 5 professionals, be maintained in OMB. Its functions should include:

- . Oversight and limited coordination of the three major aspects of the drug program -- law enforcement, treatment and prevention, and international control.
- . Staff support to the Strategy Council, the Domestic Council, OMB, the National Security Council, and others in the Executive Office of the President.
- . Selective management assistance to the drug agencies.
- . Assistance and advice on drug abuse management and budget issues to the Director and Deputy Director of OMB.

This Executive Office staff should also work with, and provide staff assistance to, other interagency drug coordinating structures which are or will be in place, including: the CCINC, the CCDAP, DEA and NIDA.

The task force recommends that as many of the responsibilities of this office as possible gradually be shifted to the departments, agencies, and Cabinet committees, in order to avoid institutionalizing direct Executive Office involvement in this area.

DEVELOPMENT OF INTEGRATED
DATA CAPABILITY

A major requirement for managing the drug program is the development of a systematic data base to serve as a foundation for both long-range and short-range program management decisions. While the information needs of senior managers are diverse and vary from agency to agency, there are elements which, when integrated, can be useful to all. Some progress has been made in identifying and integrating these elements over the past several years, but much more work is required to meet the overall needs of the drug program.

Accordingly, the task force recommends that an interagency information-sharing mechanism be established under the aegis of the Strategy Council.* This mechanism would improve Federal drug abuse program management by increasing the sharing, analyses, and coordination of drug abuse information. For example, data collected by law enforcement agencies (e.g., on the availability of various drugs) is needed by managers on the demand reduction side to accurately program resources, and treatment trend information can be useful to law

* Membership should include: DHEW (FDA, NIAAA, NIDA, NIMH); DOD; DOJ (BOP, DEA, LEAA); OMB, Treasury (Customs); and VA, S/VAI.



enforcement managers by indicating new patterns of use. In developing an information-sharing mechanism, each agency should continue to provide for its own objectives and program responsibilities; therefore, it is not practical to develop a single Federal data system in the drug abuse area. However, a periodic report to Federal policymakers consisting of selected data and analyses from all agencies will allow them to manage from an overall Federal perspective.

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The task force is confident that if the recommendations discussed in this chapter are successfully implemented they will ensure a more effective and efficient Federal drug control effort in the future. Furthermore, the task force feels confident that prompt action on these management recommendations will make possible a more rapid implementation of the policy and program recommendations presented earlier.

In the preceding chapters, the Domestic Council Drug Review Task Force has: (1) presented its assessment of the nature and extent of the drug abuse problem in the United States today; (2) evaluated current programs and policies designed to deal with drug abuse; and (3) made recommendations for improving the effectiveness of the drug program in the future.

While each recommendation is important in itself, it is the combined effect of all taken together that will produce a major improvement in the overall program to reduce drug abuse. Viewed as a whole, these recommendations underline and expand the themes discussed in Chapter 1; namely:

1. Total elimination of drug abuse is unlikely, but governmental actions can contain the problem and limit its adverse effects. We recognize that drug abuse is a long-term problem and requires a long-term commitment.
2. All drugs are not equally dangerous, and all drug use is not equally destructive. Enforcement efforts should therefore concentrate on drugs which have a high addiction potential, and treatment programs should give priority to those individuals using high-risk drugs, and to compulsive users of any drugs.
3. Efforts to reduce the supply of and the demand for drugs are complementary and interdependent, and Federal programs should continue to be based on a balance between these two concepts.

4. We must broaden existing programs aimed at supply and demand reduction. In supply reduction, greater emphasis should be given to regulatory and compliance activities aimed at curtailing diversion from legitimate production, and a higher priority should be given to increasing international cooperation in preventing the illicit production of drugs. In demand reduction, increased attention should be given to prevention and vocational rehabilitation.
5. Program management must be improved to ensure the maximum return from resources committed to drug programs. Better interagency coordination and stronger intra-agency management are required, with more attention paid to the setting of priorities.
6. The Federal Government should provide leadership in the national drug abuse prevention effort, but it cannot do the job alone. The support and cooperation of State and local governments, private businesses and community organizations are essential if we are to contain drug abuse and minimize its costs to the individual and society.

The major recommendations made throughout the white paper are listed below for easy reference.

DRUG PRIORITIES: CHAPTER 2

1. The task force recommends that when resource constraints force a choice, priority in both supply and demand reduction should be directed toward those drugs which inherently pose a greater risk -- heroin, amphetamines (particularly when used intravenously), and mixed barbiturates.
2. The task force recommends that priority in treatment also be given to compulsive users of drugs of any kind.

SUPPLY REDUCTION: CHAPTER 3

1. The task^{force} recommends that a continuous process of identifying the most vulnerable segments of the illicit distribution system be launched, and that resources be continually reallocated to focus on the most vulnerable portion of the system.

Enforcement

1. The task force, while endorsing the concept of a lead agency in drug law enforcement, recommends that the law enforcement strategy be designed to fully utilize the resources of all organizations involved in law enforcement.
2. The task force recommends that Federal law enforcement efforts focus on major trafficking organizations, particularly the leaders of these organizations.
3. The task force recommends that greater attention be given to development of conspiracy cases, which often are the only way to apprehend high-level traffickers. Detailed recommendations for accomplishing this are made in three areas: (1) building understanding and commitment to conspiracy strategy; (2) inducing cooperation of knowledgeable individuals; (3) and developing long-term approaches to investigations.
4. The task force recommends that personnel systems which recruit, train, evaluate, and reward individual agents be adjusted so that they emphasize conspiracy investigations rather than simple number of arrests.
5. The task force recommends that the Controlled Substances Units inaugurated by the Attorney General be continued and not diverted to other activities.
6. The task force endorses the President's proposal for mandatory minimum sentences for persons trafficking in hard drugs, and suggests that consideration be given to expanding the proposal to include traffickers of barbiturates and amphetamines.
7. The task force recommends mandatory consecutive sentencing rather than concurrent sentencing for persons who are arrested and convicted for narcotics trafficking while on bail from another trafficking offense.

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8. The task force recommends revoking parole in the event that a paroled offender is re-arrested on narcotics trafficking charges.
9. The task force recommends that the Internal Revenue Service re-emphasize its program of prosecuting drug traffickers for violation of income tax laws under strict guidelines and procedures.
10. The task force recommends that the President direct the Attorney General and the Secretary of the Treasury to settle jurisdictional disputes between DEA and Customs by December 31, 1975, or to report their recommendations for resolution of the matter to the President on that date.
11. The task force recommends continuation and expansion of LEAA and DEA activities aimed at strengthening State and local law enforcement agencies.

Intelligence

1. The task force recommends that a new investigative report form be devised, with a number of questions aimed at eliciting information useful to other agencies.
2. The task force recommends an analysis of the four automatic data processing systems involved in intelligence activities, with an eye to either integrating or better coordinating them.
3. The task force recommends that DEA devote more resources to the analysis of intelligence, both strategic and tactical.
4. The task force recommends that the CIA's role should continue to be focused on the collection of strategic intelligence.
5. The task force recommends that users of strategic intelligence under the guidance of CCINC identify specific strategic intelligence requirements.

International

1. The task force recommends that a higher priority be given to development of international cooperation in preventing illicit production of drugs, and that special attention be given to Mexico as the major source country for U.S. markets.
2. The task force recommends that the U.S. government intensify diplomatic efforts to heighten other governments' concern over violations of international treaty obligations; and continue participation in institutions that promote international awareness of drug abuse.
3. The task force recommends the prompt ratification of the Convention on Psychotropic Substances of 1971.
- 4 3. The task force recommends continued support for the United Nations Fund for Drug Abuse Control, but urges that the Fund be encouraged to initiate a more aggressive fund-raising program.
- 5 4. The task force recommends continued support and participation in Interpol, and the Customs Cooperation Council.
- 6 5. The task force recommends that additional emphasis be placed on the collection, analysis, and utilization of overseas operational intelligence, and recommends that U.S. agents stationed overseas concentrate their activities on international trafficking channels believed to be headed for the United States.
- 7 6. The task force recommends that continued attention be given to crop substitution as a means of reducing the supply of raw materials used in making drugs, and believes that this should be one of the major focuses of the U.N. Funds' efforts.
- 8 7. The task force recommends creating a permanent DEA/Justice/State Committee under the Cabinet Committee on International Narcotics Control to coordinate efforts to seek U.S. jurisdiction over foreign drug traffickers through extradition or expulsion.

Regulatory and Compliance

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1. The task force recommends several specific actions which will improve the program to control diversion at the wholesale level.
2. The task force recommends a major effort to upgrade the regulatory capabilities of States regarding retail diversion of drugs.
3. The task force recommends a program to improve the prescribing practices of physicians.
4. The task force recommends development by LEAA of pilot programs designed to curb pharmacy thefts.

Science and Technology

1. The task force recommends a specific set of priorities for the research effort; highest among these are projects aimed at providing better equipment for use in border interdiction, improving intelligence information systems, and better support and communication equipment for enforcement officers.
2. The task force recommends that research programs funding be kept relatively steady from year to year to enable long-range planning and development.

DEMAND REDUCTION: CHAPTER 4

1. The task force recommends that greater emphasis be placed on education and prevention efforts that promote the healthy growth of individuals and discourage the use of drugs.
2. The task force recommends that greater attention to patients in drug treatment and former drug users be paid by the vocational rehabilitation system in order to provide them with marketable skills for jobs.

Education and Prevention

1. The task force recommends that education and prevention programs address the broad developmental needs of children and youth, and be community based.
2. The task force recommends that Federal media efforts provide basic information about drugs, and emphasize successful and productive lifestyles of non-drug users, rather than using scare tactics.

3. The task force recommends that the Federal role in community based prevention be catalytic in nature; specifically, to provide training and technical assistance to local communities, to provide materials and guide books to local programs, to provide limited seed money, to evaluate existing programs, and to make the results of these evaluations available for use by other States and communities.
4. The task force recommends that an overall national program for integrating Federal, State, local and private programs for dealing with all behavioral problems in youth be developed, and identifies eleven separate government programs which should be included in this overall review.

Treatment

1. The task force recommends that agencies involved in drug abuse treatment give treatment priority to abusers of the following high-risk categories of drugs: heroin, barbiturates (especially when mixed with other drugs), and amphetamines (particularly when administered intravenously). Priority should also be given to compulsive users of drugs of any kind.
2. The task force recommends that NIDA be given the authority to assure that users of lower priority drugs can obtain treatment, when available, at Community Mental Health Centers, in accord with Section 401A of the Drug Abuse Office and Treatment Act of 1972.
3. The task force recommends that hospital treatment for drug abuse should be severely restricted in order to reduce overall costs, and outlines specific guidelines for its use.
4. The task force recommends that the use of outpatient drug-free treatment for compulsive users of high-risk drugs be restricted, and these people treated in a more structured environment. The use of outpatient drug-free treatment for casual users of lower-risk drugs should also be restricted, and the funds thus freed used to provide more effective services for high priority drug users.
5. The task force recommends that LAAM, rather than methadone, be used as a medication for opiate-dependent persons as soon as its safety and efficacy have been determined.
6. The task force recommends that the Food and Drug Administration (FDA) methadone regulations be published immediately.



7. The task force recommends that training courses to increase skills of paraprofessionals be expanded.
8. The task force recommends prompt resolution of existing jurisdictional and organizational problems between DEA, NIDA and FDA by the Assistant Secretary for Health, HEW.
9. The task force recommends that drug abuse treatment be part of the required curricula of medical schools and schools of social work, psychology, and vocational rehabilitation.
10. The task force recommends that categorical funding for drug treatment programs be stabilized so that cost sharing is at a maximum rate of 60 percent Federal and 40 percent local until local governments or community organizations are able to assume fiscal responsibility above this level.
11. The task force recommends that long-term efforts be initiated to incorporate drug abuse treatment services into the general health care delivery system.
12. The task force recommends that the Federal Government be prepared to fund additional community treatment capacity, if necessary, and recommends that the specific need be identified by December 1, 1975.

Vocational Rehabilitation

1. The task force recommends that NIDA and the Department of Labor review all regulations to ensure that they do not impede the provisions of vocational rehabilitation services to drug abusers. This applies to the NIDA confidentiality regulations as well as vocational rehabilitation regulations.
2. The task force recommends that the Rehabilitation Services Administration (RSA) instruct State vocational rehabilitation agencies that the regulation which states that no individual or group may be excluded because of their disability will be strictly enforced in connection with drug abusers.
3. The task force recommends that NIDA encourages Single State Agencies to develop cooperative agreements with manpower and vocational rehabilitation services in their areas.

4. The task force recommends that NIDA and RSA develop joint research and demonstration projects to improve the delivery of rehabilitation and employment services to drug abusers.

Criminal Justice System

1. The task force recommends that treating criminal offenders who abuse drugs be given the highest priority. The Departments of Justice and HEW should establish a permanent working group, charged with seeking ways to expand the interface between the criminal justice and drug treatment systems. This criminal justice working group should publish a semi-annual report that addresses the progress made in implementing the recommendations discussed in the White Paper with further recommendations for future initiatives. The first report would be due in March 1976.
2. The task force recommends that the pilot pre-trial service projects, to be established in ten Federal judicial districts as a result of the Speedy Trial Act of 1975, routinely screen all arrestees to determine if they have a history of drug abuse or are currently using drugs. The results of these ten pilot pre-trial services projects should be evaluated as soon as possible.
3. The task force recommends that funding for the Treatment Alternatives to Street Crime (TASC) program be maintained at its present level of approximately \$4 million per year, and the program be expanded to include any jurisdiction with a population of over 200,000 which can demonstrate eligibility.
4. The task force recommends that funds and responsibilities be transferred from the Bureau of Prisons to the U. S. Probation Office so that USPO can contract for and administer treatment services for Federal parolees and probationers.
5. The task force recommends that the U.S. courts and the Bureau of Prisons alter their policy regarding drug-free treatment and accept methadone maintenance as a proper treatment alternative for parolees and probationers.

6. The task force recommends that Title III of the Narcotic Addict Rehabilitation Act of 1966 be terminated, and the budgetary savings diverted to NIDA to supplement grants in treatment areas which have prospective clients or waiting lists.

Research, Demonstration, and Evaluation

1. The task force recommends that priorities in research be established for follow-up studies on the progress of clients after leaving treatment, and to determine relative effectiveness of different prevention, treatment, and rehabilitation approaches.
2. The task force recommends that NIDA formulate a plan for research, demonstration, and evaluation in consultation with other agencies involved in RD&E; those agencies should then develop their specific plans to supplement rather than duplicate NIDA's plan.

PROGRAM MANAGEMENT; CHAPTER 5

1. The task force recommends that the Strategy Council on Drug Abuse be given additional responsibilities to provide coordination between supply and demand reduction programs, and that the Assistant to the President for Domestic Affairs be made a member and designated as Chairman. The task force also recommends that the Secretary of the Treasury be added to the Strategy Council.
2. The task force recommends the creation of a Cabinet Committee on Drug Abuse Prevention chaired by the Secretary of the Department of HEW to provide coordination among agencies involved in drug abuse demand reduction activities. Membership of the CCDAP should include the Secretary of HEW, the Secretary of Defense, the Secretary of Labor, Administrator of the Veterans Administration, and the Attorney General.
3. The task force recommends that the Secretary of HEW appoint an executive director of the CCDAP who will serve as chairman of an Assistant Secretary level work group. This work group should be supported by a series of interagency functional groups which would provide detailed coordination in specific areas; eg., treatment, education prevention and research.



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4. The task force recommends CCDAP be charged with preparing annually a government-wide assessment of drug abuse demand program requirements, and *with* publishing semi-annually a report on the status of drug abuse in the United States.
5. The task force recommends that DEA continue its corresponding lead agency role regarding law enforcement and regulatory programs, as designated by Executive Order No. 11727.
6. The task force recommends continuing a small Executive Office staff, located in the Office of Management and Budget, to provide assistance and advice to the White House staff, the Strategy Council, and OMB. The task force recommends that the responsibilities of the Office gradually be shifted to the departments, agencies and Cabinet Committees.
7. The task force recommends the creation of an interagency executive committee to improve the sharing, analysis, and coordination of drug abuse information at the Federal level.

A P P E N D I X

Comments of Department of the Treasury/ U. S. Customs Service

Comments of Drug Enforcement Administration

Comments of Veterans Administration



Treasury/Customs Service
Addendum to Domestic Council White Paper

The purpose of this paper is to indicate Treasury/Customs disagreement with some of the major White Paper conclusions relating to law enforcement efforts. All indicators reflect a worsening narcotics problem on all fronts. The expectations of Reorganization Plan No. 2 have not been met. The fact that major failures have occurred in developing an effective intelligence system is acknowledged. There has not been effective coordination among agencies with enforcement or supply reduction roles. These facts must be more fully addressed. Specifically, how can we reconcile a White Paper which:

- a. states in effect that the current narcotics strategy has some shortcomings, but has been basically effective with published reports from the medical profession, various Government agencies and even the drug agency stating that there is an epidemic increase of heroin addicts and heroin related deaths and substantial increases in the availability of all narcotics and dangerous drugs?
- b. acknowledges that we cannot stop the growth of the opium poppy in many countries, particularly Mexico and Thailand, with the proposal that we should increase our commitment in manpower and resources to these governments, particularly in the absence of a genuine national commitment backed up by substantial resources in their budgets?
- c. concludes that all U. S. resources are now effectively organized and being used to combat the narcotics problem with the fact that available resources are not being fully utilized?

- d) proposes to commit additional resources to a method of approach which has repeatedly been questioned and which has not achieved the results that its framers intended (Reorganization Plan No. 2)?

After more than two years of experience with the single agency investigative concept, it is obvious that the complete exclusion of Customs from intelligence gathering and investigative activities relating to narcotics smuggling has been counter-productive to the overall national narcotics enforcement effort. The current failure to pursue conspiratorial leads resulting from border seizures and arrests and the under-utilization of intelligence and investigative resources has created a major gap in a comprehensive narcotics enforcement program. The full utilization of Customs intelligence and investigative resources would be a positive step in maximizing Federal narcotics enforcement effectiveness.

What is called for in our view is a concise policy decision paper without detailing the strategy for dealing with each part. In assessing what U. S. strategy should be, we must be flexible enough to adopt changes where necessary to assure utilization of all available U. S. resources and to give the USG maximum flexibility in obtaining foreign government cooperation for improving our overall effort. Together these steps could give the U. S. a greater chance to exercise real leadership in the global effort and promote our own interests.

Treasury, together with Customs, urges the following:

1. The lead agency concept under Reorganization Plan No. 2 should not be the basis for denying the USG diplomatic flexibility should special circumstances in certain countries dictate the marshalling of additional and available resources.

What is needed is clear acceptance of agency roles and missions, full utilization of existing resources, skills, and statutory and regulatory authority to accomplish not only individual agency mission but to support each other's mission. Just as the Drug Enforcement Administration and other agencies have good relations with counterpart police officers in foreign countries, so the Customs Service has particularly close relations with its counterpart Customs Services in virtually every country, most of which are members of the Customs Cooperation Council. Since these foreign Customs Services are the principal repositories of information about smugglers in their countries, and since they generally prefer to deal with U. S. Customs rather than any other U. S. agency in the exchange of intelligence regarding narcotics, it would be most productive for the U. S. Customs Service to collect intelligence abroad on all types of smuggling, including narcotics. A limited additional number of Customs agents assigned overseas to investigate and collect intelligence on narcotics could contribute materially to enhanced enforcement capabilities at U. S. ports and borders.

2. The most effective and efficient means of interdicting the drug traffic is to seize the high-value, concentrated narcotics at the borders of the United States. The statutory authority of search and seizure by the U. S. Customs Service is broader than that of any U. S. enforcement agency. Effective drug interdiction at the borders is dependent upon the gathering of intelligence abroad concerning potential shipments and the application of all enforcement tools to accomplish the actual seizures at the border.
3. Overseas efforts both in manpower and funding may have limited impact in reducing the long-term availability of drugs in the U. S. so long as the world opium supply far exceeds demand. It is unrealistic to expect that the USG alone can effectively reduce the supply of illicit drugs from abroad by overseas effort in the foreseeable future. While the U. S. can provide the leadership, as important will be the efforts by the countries themselves to improve their anti-narcotics capabilities. We should (a) advance the concept that recipient countries should become totally self-sustaining in the anti-narcotics programs now funded by the U. S.; and (b) move toward the goal of "de-Americanizing" the overseas effort as rapidly as possible.
4. The International Functional Work Group formulated a series of options focusing mainly on diplomatic initiatives designed to elicit a Mexican commitment to devote a larger share of its own resources for major programs of eradication and enforcement and for increased efforts along the Mexican border. Without detracting from the foregoing, it appears essential that the base of U. S. efforts in Mexico be broadened to encompass as many branches of the Government of Mexico as possible by utilizing incentives for favorable Mexican action as described above. Action to that end should also contribute to greater flexibility in moving against funds used to finance drug trafficking. Reciprocal strengthening of U. S. enforcement efforts along the Southwest border is required as a clear sign of U. S. commitment to substantial drug supply reduction.
5. While prioritizing treatment efforts may be required and beneficial, the United States can suffer only tragic consequences by practicing selective law enforcement. Enforcement must be even-handed and comprehensive to be effective and corruption-free. To de-prioritize marijuana and cocaine can only erode further respect for law and law enforcement officers. Certainly,

the fact that the United States is experiencing the highest level of contraband smuggling since Prohibition is an indication of the involvement of organized criminal elements utilizing the derived illicit profits for additional criminal activity. During the past 90 days, there have been seizures of 13 tons, 18 tons, 43 tons and 6 tons of marijuana and dozens of seizures exceeding one and two tons. These smuggling ventures have been by boat, airplane and every conceivable means. There is an unprecedented volume and scope of contraband smuggling activity which should not be ignored or de-emphasized by Federal law enforcement agencies.

Comments of the Drug Enforcement Administration

SUPPLY REDUCTION STRATEGY

AND THE ROLE OF PRINCIPAL FEDERAL AGENCIES

As the White Paper correctly observes, the principal component of the Federal Government's supply reduction strategy is the law enforcement effort and related functions. The necessity of this activity is easily grasped by the public at large, but the successful pursuit of a strategic enforcement policy, the complexity of the factors involved, and the appropriate roles of the various Federal agencies is a matter poorly understood by those not directly involved. The White Paper has dealt with many of these issues and illuminated important strategy and policy considerations. There are, however, additional facets which are worthy of expression and which form the basis of this comment.

The traffic in illicit drugs is structured in a fashion similar to any other major national and international commerce with the exception that the activities necessary for its maintenance are criminal in nature. Thus, as in any commercial endeavor, tens of thousands of people are involved at different levels, in transactions of varying sizes and importance. The enforcement resources which the Federal Government is capable of employing against this mass of persons and transactions is necessarily limited and must be directed in such a way as to produce strategic impact. That is to say that the bulk of the drug enforcement activity must be left to state and local police departments, and Federal efforts must be reserved for targets which are customarily beyond their reach and the disruption of which can have significant impact on the structure of the total traffic. This has been emphasized in the White Paper, and our purpose is simply to show where such emphasis must lead in an operational context.

Basically, Federal enforcement efforts are divided into three distinct functional areas. These are interrelated by virtue of the single mission which each seeks to serve, but otherwise dissimilar in the sense that they represent a clear division of labor required for the efficient use of resources.

I. Investigation.

The first and most important effort is the aggressive investigation and apprehension of those individuals directly responsible for the organization of this illicit commerce. The activity of these persons, which spans continents and cultures, makes possible the maintenance of an illicit drug traffic with a continuity and volume which could not otherwise be sustained. Their identification and apprehension can form a strategic blow to the traffic, sharply reducing the continued availability of drugs.

In order to ensure that Federal investigative efforts are in fact targeted in this strategic fashion, it is necessary that a single agency with the



total conceptual grasp of the problem be able to cull through the vast amount of intelligence and leads developed by itself and other Federal, state, and local agencies. Moreover, since much of the traffic in drugs is of international scope, it is necessary that this agency establish and maintain functional offices abroad in order to make possible the penetration of criminal organizations at both ends of the flow of traffic. It is at the foreign source and the domestic points of delivery where the greatest opportunities for penetration exist. Customarily, several weeks or more of advanced planning will be required in the foreign country to obtain the financial backing, to recruit couriers, and to plan for the concealment and smuggling of the contraband goods. This provides a number of opportunities for undercover penetration and surveillance by foreign police assisted by their U.S. counterparts.

By the same token, similar opportunities exist simultaneously within the United States, where those violators destined to receive the illicit drug shipment are reaching out for customers and co-conspirators to facilitate their eventual distribution. In contrast with the smaller smugglers, who will seldom be the target of Federal investigative efforts, the actual crossing of the U.S. border with the contraband goods is the point of least vulnerability for the large, organized criminals. Here the goods pass amidst tons of other cargo and thousands of other persons during a brief interval of time concealed with all the cleverness and resources which such an organization can muster. If penetration has not already been achieved by investigators on either one or both sides of the national border, no opportunity is likely to occur during this brief interval.

Again, it is clear on the basis of reason as well as reference to past experience that a single agency must have total purview of the investigatory effort on both sides of the U.S. border in order to: (1) ensure appropriate targeting of investigatory resources, (2) achieve coordinated cooperation of both foreign and domestic investigatory efforts, and (3) make tactical decisions as to most favorable time, place, and circumstances to culminate the investigation with arrests, indictments, and seizures. This mission has been entrusted by the President and the Congress to the Drug Enforcement Administration, an agency of the Department of Justice created by Reorganization Plan No. 2 of 1973. It was the clear intention of the Congress and the President to create a single agency to pursue this particular form of the Government's effort.

A. History of Reorganization Plan No. 2.

Prior to its creation, this single function was fragmented between the Bureau of Narcotics and Dangerous Drugs and the United States Customs Service. This represented a counterproductive division which had existed at least since the founding of the Federal Bureau of Narcotics in 1930 and had often resulted in operational and jurisdictional disputes of a destructive nature. These problems were thoroughly documented in both the Senate and House reports and hearings in the spring of 1973. Moreover, many years of experience had proven that the nature of these conflicts

were such as to require a final and absolute organizational solution. For example, as early as 1956, it had become necessary for the Assistant Secretary of the Treasury to intervene in operational disputes between the Federal Bureau of Narcotics and the Customs Service. Subsequently, in 1960 and again in 1964, an effort was made to negotiate operational guidelines to define the agencies' respective roles. In 1966, the Treasury Department resorted to the appointment of an independent mediator for the purpose of adjudicating disputes relating to particular investigations.

Nor were the problems solved in 1968, when the former Bureau of Narcotics was reorganized and transferred to the Department of Justice as the Bureau of Narcotics and Dangerous Drugs. The new agency was then described as a "new super narcotics agency" which would have lead responsibilities for Federal drug enforcement. Almost immediately the old conflicts which had taken place within the Treasury Department surfaced in a new interdepartmental context. This led to the negotiation of yet another set of guidelines signed by the Attorney General and the Secretary of the Treasury in 1970. Again in March of 1971, because of continuing disputes, it became necessary for the President to issue further written instructions to each of the parties involved. It was in the light of this history and the demonstrated need to put an end to three decades of bureaucratic conflict that Reorganization Plan No. 2 was conceived and approved.

In Chapter No. 3, entitled "Supply Reduction," the White Paper references continuing disputes between the Drug Enforcement Administration and the U.S. Customs Service. These disputes are primarily concerned with the techniques for establishing working cooperation in the field and the exchange of intelligence between the two agencies. They are in some sense a residue of the jurisdictional conflicts of past decades. In our own opinion, these have been exacerbated in recent months because of the Customs Service's dissatisfaction with the jurisdictional determinations expressed in the Reorganization Plan and its hope of returning to the previous state of affairs as a result of the present study and similar inquiries being conducted by a Senate subcommittee.

The White Paper acknowledges that the Reorganization Plan created a single lead agency for drug investigations but suggests that ambiguities exist within the plan itself in the manner in which it divided responsibilities among the Federal agencies affected. It further states that this should be the subject of further negotiated settlement between the Attorney General and the Secretary of the Treasury. We recognize the tensions which exist but feel that these are the results of other factors and not ambiguities within the Reorganization Plan.

This can be established by reference to the explicit language of the plan and its legislative history. For example, the final report of the Senate Subcommittee on Government Operations stated that the purpose of the plan is "to place primary responsibility for Federal drug law enforcement in a single, new agency, the Drug Enforcement Administration (DEA), in the



Department of Justice." It further references the language of the plan in Section 1, entitled "Transfers to the Attorney General," to the effect that:

"There are hereby transferred from the Secretary of the Treasury, the Department of the Treasury, and any other officer or any agency of the Department of the Treasury to the Attorney General all intelligence, investigative, and law enforcement functions vested by law in the Secretary, the Department, officers, or agencies which relate to the suppression of the illicit trafficking in narcotics, dangerous drugs, or marihuana. . . ."

But although the plan is explicit in its determination of principles and in establishing a division of function, ambiguities may in fact appear to exist in terms of the classification of particular types of activities in which each agency may be involved. For example, in the chapter on "Supply Reduction," one of the items listed as necessary for negotiation is the question of "jurisdiction over air interdiction and the use of transponders in suspected aircraft." This is obviously a specific matter which was not addressed by the Reorganization Plan as such. The question then is whether and to what degree air interdiction and the use of transponders is an investigative technique or a patrol and search function. Obviously, a question of this kind can only be determined by rigorous analysis of the nature and purpose of the activity, the type of training required and the skills which it encompasses.

The same is true of certain other items depending upon the meaning which one ascribes to them. For example, liaison with foreign customs agencies on narcotics matters may relate to exchanges of an investigatory nature, in which case the Reorganization Plan dictates that they be performed by the Drug Enforcement Administration, or to the exchange of information regarding smuggling tactics, which the plan clearly leaves within the jurisdiction of the Customs Service. Such is not the case, however, with regard to the debriefing of informants and persons arrested at the ports and borders. This is clearly an investigative activity for which the DEA is, therefore, responsible. A series of meetings have already taken place between the Deputy Attorney General and his counterpart within the Department of the Treasury to work out such matters, and a continuing effort will be made in accordance with the White Paper's recommendations.

But both common sense and existing law mandate the continued centralization of investigative responsibility within a single agency to ensure the kind of total coordination which the President and the Congress desire and the use of enforcement resources in a strategic fashion on the basis of strategic standards. The investigative function was formerly performed in part by the Customs Service prior to the Reorganization Plan; and in recognition of this existing resource, some 500 Customs agents were in fact transferred to the new DEA. Should a further surplus of Customs manpower be identified and earmarked for drug investigative activity, then the principles of the



Reorganization Plan would dictate that such manpower also be transferred to the DEA, where it can be made part of a total coordinated strategic effort. The central point which we wish to emphasize here is that the plan itself contains no ambiguity but provides clear principles for the allocation of specific responsibilities on the basis of whether their essential nature relates to investigative activity as opposed to search and seizure functions to be performed by uniformed personnel.

B. Investigatory Strategy.

Finally, in its discussion of the investigatory function, the White Paper makes certain recommendations regarding the use of this resource. Essentially, it calls for increased concentration of enforcement efforts on the major violators and the organizations responsible for the traffic in large quantities of illicit drugs. In particular, it recommends greater emphasis on the development of conspiracy investigations and prosecutions. This is a judgment with which DEA is in accord.

Both DEA and its predecessor have sought to depart from historical practices which tended to measure success and justify resource allocation on the basis of sheer numbers of persons arrested and convicted for drug offenses. The enforcement managerial system which DEA now employs seeks to provide a means of measuring the importance of the violators arrested in order to gauge both performance and effectiveness. In spite of the improvements which have been made in targeting investigative resources at high levels, a recommendation for increased emphasis in this area is still justified. It is important that the Congress and the public perceive that a successful enforcement program need not necessarily produce either a high volume of arrests or seizures. These are useful but sometimes artificial measures of performance.

In carrying out such a policy, the development of conspiracy investigations is a major technique, though not an exclusive one. It is necessary to have at one's command a full array of legally permissible investigative techniques from which one may choose in order to fit the circumstances of each particular case. Moreover, it will continue to be necessary to expend investigative resources on less desirable targets in order to develop the intelligence base and recruit the informants necessary to identify major violators and to initiate investigatory probes. We believe that the White Paper recommendations in this area provide correct emphasis and preserve necessary flexibility.

C. Improvements in the Criminal Justice System.

Another problem with which the White Paper is concerned is one worthy of further emphasis; this is the necessity of major changes and improvements in the criminal justice system, in bail bond practices, in the sentencing structure, and perhaps also in the areas of penology and corrections.

uniformed inspectors is the first line of defense against this particular type of smuggling activity. It is a role of sufficient importance to merit the full attention of the Customs Service and the Border Patrol and to justify the appropriation of increased resources.

This force of interdiction also increases the difficulties and expenses of those organizations involved in large scale smuggling activities. A vigilant force at the ports and borders increases the possibility of detection and therefore forces the adoption of more expensive and complicated smuggling techniques. This in turn impacts on the degree of planning involved and the numbers of persons who will acquire knowledge of each projected shipment. Thus, another indirect benefit of the Customs and IRS inspection effort is to increase the number of opportunities both at home and abroad for the penetration of organizations by the investigative agency. Additionally, interdiction forces occasionally discover an important shipment involving high level violators which may in turn form the basis for further penetrations by DEA's investigative forces. These duties were expressly reserved to the Customs Service by Reorganization Plan No. 2 of 1973 in recognition of the importance of this task as a part of the Federal supply reduction effort. This effort will be most effectively served if the management of the Customs Service will concentrate its emphasis on this task rather than seeking to develop a secondary duplication of existing investigatory efforts.

DEA recognizes that the search and seizure function at the ports and borders can be further facilitated if these officers are provided with intelligence which will help to target their efforts. A special unit has been established within the DEA Office of Intelligence to improve its own contribution to both the Customs and Border Patrol officers. Further measures might include the actual co-location of DEA agents at key ports and borders to work closely with Customs inspectors. Customs personnel might also be selectively located in key DEA intelligence offices in Washington, El Paso, and elsewhere. The INS and the Customs Service are already participating with DEA in the El Paso Intelligence Center with promising results.

III. Government-wide Support.

The third element of the Federal drug enforcement effort consists of the supporting efforts of various Federal agencies in accordance with the role appropriate to each. In other words, although Reorganization Plan No. 2 established a principal agency for the investigation of and collection of intelligence concerning the illicit drug traffic, it recognized that other agencies such as the FBI, IRS, ATF, and CIA could make unique contributions as a spin-off of the pursuit of their particular missions. Each of these agencies and others with lesser roles can acquire valuable intelligence or provide other types of assistance while pursuing their own statutory mandate. For example, the FBI, in the course of debriefing its own informants and as a result of the arrest, interrogation, and search and seizure procedures of its agents, may acquire valuable operational and tactical intelligence regarding drug violators. Timely development and

There is no doubt that further improvements can be made in the efficiency with which investigative resources are employed. This is a goal to which the DEA management is dedicated, but neither existing efforts nor improvements in them will bring about a satisfactory result in combatting the illicit drug traffic unless major changes are made in the rest of the criminal justice system. The present circumstances in which violators are merely cycled and recycled through the criminal justice system as a result of their arrest and conviction can only be termed one of frustration.

Similar improvements can also be achieved in our cooperative efforts with foreign nations. We can expect no more serious attention from foreign governments than we are willing to give ourselves. The White Paper has correctly observed that improvements in our own criminal justice system can reflect favorably in providing the necessary support for our diplomats abroad. The White Paper further recommends the establishment of a permanent committee composed of representatives of the Department of Justice and the Department of State for the purpose of pursuing the extradition and expulsion of drug traffickers located abroad. DEA is of the view that this vehicle should also be used to reevaluate existing offenders and to recommend treaties where they are lacking. In many cases, existing treaties will require renegotiation in order to effect this objective. It should be noted in this regard that indictments have been obtained by DEA against a significant number of major traffickers located abroad and that the absence of extradition treaties or of appropriate provisions within existing treaties has prevented further judicial action within the United States.

II. Interdiction.

The second most important enforcement effort within the total Federal strategy is the interdiction of the flow of illicit drugs at the United States ports and borders. This function is allocated to the U.S. Customs Service and the Border Patrol of the Immigration and Naturalization Service. It is performed in a manner entirely unlike that of the investigatory function and is designed to achieve different but related objectives. In addition to the organized groups responsible for the movement of large quantities of drugs which are the proper targets of investigatory activities, many thousands of smaller violators are continually smuggling lesser quantities of illicit drugs across the U.S. ports and borders. The sheer numbers of such individuals and the volume of traffic in which they are individually engaged make them inappropriate as targets of Federal investigative activity. But because of the smaller financial resources and lack of well-developed organization, they are particularly vulnerable to the skilled search techniques employed by uniformed Customs officers at the ports and borders and their Border Patrol counterparts.

Moreover, as a group, they are collectively responsible for the smuggling of a substantial percentage of the illicit drugs which appear in the domestic traffic. The border search and seizure technique perfected by these



transfer of this information can facilitate DEA's investigatory effort and enhance its performance. This policy is in fact being pursued by the FBI with vigor. The White Paper also references the highly successful program of the IRS, which focused its own particular tax investigative expertise on the financial transactions of suspected drug traffickers.

But non-enforcement agencies of the Federal Government frequently provide support which, although ancillary to their principal mission, is indispensable to a successful supply reduction strategy. For example, the Department of State has provided the diplomatic initiative necessary to procure the interests of foreign nations and to lay the ground work for the cooperation of DEA agents with their foreign counterparts. The CIA, as was noted in the White Paper, plays a valuable role in the collection of strategic intelligence in many foreign countries. The Department of Agriculture continues to provide valuable technical assistance in programs which envision crop substitution and eradication. The Federal Aviation Administration participates in DEA's El Paso Intelligence Center for developing intelligence concerning the traffic in drugs across the U.S./Mexican border. Finally, the Food and Drug Administration, as has been stated, participates in and supports many of the regulatory decisions designed to reduce the diversion of legitimate drugs.

IV. Conclusion.

DEA has established liaison and cooperation with each of these agencies and departments of government. Each provides a unique type of expertise not duplicated within DEA itself and in no sense representing discordant jurisdictional ambiguities. Thus, where the statutory divisions of labor are recognized and taken advantage of, the basis exists for establishing a team effort in which each can assist in achieving the Government's ultimate objectives. The DEA is committed to absolute cooperation and fulfillment of its role within the concept of interdepartmental teamwork called for by the White Paper. It is also committed by virtue of both policy and practice now in force to increasing the targeting of investigative resources at the major violators and organizations responsible for much of the traffic in illicit drugs. It is DEA's view that the perception of the correct supply reduction strategy as briefly summarized in this comment will clarify the understanding of the appropriate roles which each agency should play in the overall Federal effort. This understanding is the key to the elimination of the kinds of counterproductive and often petty bureaucratic tensions which have sometimes occurred. Finally, DEA strongly indorses the need to give attention to massive and comprehensive improvements in the total criminal justice system of which it is but a small part.

COMMENTS OF THE VETERANS ADMINISTRATION

It is crucial for effective planning that the program strategy be sufficiently broad at its base, so that it effectively addresses a majority of the population at risk. The range of the national problem includes an estimated half million opiate addicts, an estimated two million polydrug (multiple drugs) abusers (including alcohol), and approximately nine million alcoholics. The program strategy proposed may be too narrow for effectiveness and efficiency, since it is so heavily weighted toward opiate abuse and other "illegal" drugs.

The increasing incidence rate of polydrug (multiple drug) abuse, often finding alcohol coupled with an illegal substance, and the commonality of causes so often reported by clinicians treating cases of drug and alcohol abuse, require that we propose a strategy combining resources against alcohol abuse, non-alcohol drug abuse, and mental health education and treatment skills. A casual attention to this core issue may, across time, frustrate any attempt to define and measure treatment goals or milestones of progress.

It is necessary that we recognize early the most difficult aspect of such planning: current organization and operational interfaces between the HEW National Institutes of Mental Health, of Alcohol Abuse and Alcoholism, and of Drug Abuse. Each Institute's program activities are relatively independent of requirements for coordination or congruence with the other two Institutes, despite considerable overlap in categories and levels of professional skills utilized, types of clinical problems diagnosed and treated, and techniques employed in treatment and rehabilitation. These Institutes (NIDA, NIMH, NIAAA), must function as peer-sponsors of any strategy which proposes a broad-based attack on this national social and medical problem.

The definition of drug abuse provided in Chapter 2 appears to include alcohol. The chart provided indicates alcohol is the most frequently abused drug in all age ranges. The notation that alcohol is excluded because public and social policy regarding this drug is significantly different would seem to beg the question. Increased Federal intervention is needed to provide needed treatment and prevention services

for alcohol abusers, particularly for the younger population. Increased Federal intervention is needed to improve the public and social policy regarding alcohol abuse, since the current policies find alcohol abuse rapidly growing, notoriously at the younger age range.

We are concerned that the strategy's focus on illegality may miss the significance of a drug's index for morbidity and mortality. In support of the inclusion of the major drug of abuse, alcohol, it is noted that the strategy addresses abuse of solvents and inhalants, which are, in the main, legal drugs.

It is recommended that the proposal for Federal media efforts to provide basic information about drugs and their effects, include a focus on alcohol, the most dangerous and most destructive drug in physical, emotional, social and economic dimensions.

It is recommended that NIMH, rather than NIDA, be tasked to ensure that federally funded Community Mental Health Centers provide services for drug abusers. Recent Congressional actions in support of CMHC's have increased the range and the complexity of these centers. NIMH, the program sponsor, is more appropriately taskable for this need. (re: Chapter 4, p. 4-13)

It is recommended that NIAAA be added to the proposed Vocational Rehabilitation Subcommittee under CCDAP, due to the high incidence of unemployment in alcoholics. (p. 4-28)

It is recommended that ADAMHA have the proposed overall responsibility for Federal RD&E planning. This will provide improved integration of substance abuse research, including alcoholism and problem behaviors which are associated with and/or tend toward drug abuse. (p. 4-40)

We recommend the addition of NIAAA to the HEW activities joined to the working group. (Chapter 5, p. 7)

The duties of the Executive Director of CCDAP should be clarified as they specify "provide leadership in planning and coordinating drug abuse prevention with other Federal programs." Such authority over other Federal agencies by an HEW appointee would seem to risk creating an imbalanced interagency relationship in the area of drug abuse, with depreciated liaison with NIAAA and NIMH. (Chapter 5, p. 8)

We must question Chapter 5's assertion that "NIDA gradually assumed most of SAODAP's functions, allowing SAODAP to expire as scheduled on June 30, 1975." With the exception of the transfer of authority for oversight of the confidentiality requirements of drug abuse



programs, the only SAODAP functions which were transferred to NIDA were those specifically continued by the law which created NIDA. The assumption of the role of "lead" Federal agency should be reviewed for its authority and for its effect on interagency relations. (Chapter 5, p. 3)

WORK GROUP

Edward E. Johnson, Study Director
Jonathan C. Rose, Chairman, Supply Reduction Work Group
Lee I. Dogoloff, Chairman, Demand Reduction Work Group

SPECIAL ACTION OFFICE FOR DRUG ABUSE PREVENTION

Candace Cowan
Charles Yarbrough

OFFICE OF THE VICE PRESIDENT

Mary P. Crinigan

DEPARTMENT OF DEFENSE

James L. Graff
James F. Holcomb

DEPARTMENT OF HEALTH, EDUCATION
AND WELFARE

National Institute on Drug Abuse

James R. Cooper (Chairman, Treatment and Rehabilitation Work Group)
Stuart Nightingale (Chairman, Research Work Group)
William Spillane (Chairman, Information Systems Work Group)

| | |
|--------------------|--------------------|
| Richard Bucher | Richard Belleville |
| Karst J. Besteman | Mary Cahill |
| Robert Dormer | Joshua Hammond |
| Carl S. Hampton | Kenneth Howard |
| Nick Kozel | Bernard McColgan |
| John Olsen | Philip Person |
| Richard Phillipson | John Scanlon |
| Melvin Segal | Jean Paul Smith |
| Pamela Thurber | |

Food and Drug Administration

Edward C. Tocus
James S. Kennedy

Social Rehabilitation Service

James J. Burr

Rehabilitation Systems Administration

Gregory M. March

Office of Education

Helen Nowlis (Chairman, Education and Prevention Work Group)

Betty Rasmussen

DEPARTMENT OF JUSTICE

F. William Hawley III (Chairman, Intelligence Work Group)

Allan Kornblum (Chairman, Law Enforcement Work Group)

Robert Alex

Charles Jaffee

Stephanie Ross

William Ryan

Morton Sitver

Drug Enforcement Administration

Kenneth Durrin (Chairman, Regulatory Work Group)

Donald R. Sheldon (Chairman, Science and Technology Work Group)

George Belk

John Cusack

Martin Kurke

John Langer

James Ludlum

Mark Moore

Howard Safir

William Wanzeck

Law Enforcement Assistance Administration

Frank de la Fe

Peter L. Regner

Immigration and Naturalization Service

Peter W. Currall

Michael T. Horkan

Bureau of Prisons

Frank Colin (Chairman, Criminal Justice System Work Group)

Stanley D. Davenport

George I. Diffenbaucher

DEPARTMENT OF LABOR

Dolores Battle

Martin Nemirow

DEPARTMENT OF STATE

Malcolm Lawrence (Chairman, International Work Group)

David H. Ernst
Frank Johnson
Joseph D. McLaughlin

Agency for International Development

Mary Wampler

DEPARTMENT OF TREASURY

Morton Bach
John F. Corbin

U. S. Customs Service

Paul R. Andrews
E. Richard Atkinson
John Brady
Jay Corcoran
Alfred R. DeAngelus
Francis E. DeSantis
Harold Diaz
Eugene H. Mach
Albert Seeley

Internal Revenue Service

Singleton B. Wolfe

VETERANS ADMINISTRATION

Stewart

~~Stuart~~ Baker, M.D.
Harry McKnight

PROBATION DIVISION ADMINISTRATION OFFICE, U.S. COURTS

Donald L. Chamlee
Michael J. Keenan

OFFICE OF MANAGEMENT AND BUDGET

Richard Eisinger
Gerald Fill
Richard Harkness
Joseph Linnemann
Robert Lockwood
Richard Williams



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CONTRIBUTORS FROM OUTSIDE GOVERNMENT

We are greatly indebted to the following persons and organizations for providing counsel and suggestions regarding the President's White Paper:
hus

Juan D. Acevedo
Executive Director, Narcotics Prevention Project
Los Angeles, California

Patrick B. Augustine
Youth Advisor to the Governor's Council
on Drug Abuse
Topeka, Kansas

Larry A. Bear
Director, National Action Committee for Drug Education
University of Rochester
Rochester, New York

Carol M. Becker
Director, Drug Abuse Project
National League of Cities, U. S. Conference
of Mayors
Washington, D.C.

Bernard Bihari, M.D.
Assistant Commissioner, Addiction Programs
New York, New York

Richard J. Bonnie
Associate Director
National Commission on Marijuana & Drug Abuse
Washington, D.C.

Peter G. Bourne, M.D.
Consultant, Drug Abuse Council, Inc.
Washington, D.C.

Thomas E. Bryant, M.D.
President, Drug Abuse Council, Inc.
Washington, D.C.

Paul Cushman, Jr., M.D.
Director, Methadone Maintenance Treatment
Saint Luke's Hospital
New York, New York

Dennis DeConcini
Administrator
Arizona Drug Control
Washington, D.C. *Tucson, ARIZONA*

David Deitch
Consultant for Drug Abuse Programs
Berkeley, California



Burt C. D'Lugoff, M.D.
Director, Baltimore City Hospital Program
Baltimore, Maryland

Joel A. Egertson
Chairman, National Association of
State Drug Abuse Coordinators
St. Paul, Minnesota

Mathea Falco
Drug Abuse Council, Inc.
Washington, D.C.

Michael Gemmell
Legislative Representative
National Association of Counties
Washington, D.C.

William Harvey
Executive Director, Coalition of Drug Programs
St. Louis, Missouri

Rayburn Hesse
Director, National Association of State Drug
Abuse Coordinators
Washington, D.C.

Jerome H. Jaffe, M.D.
Professor of Psychiatry
Columbia University
New York, New York

Robert B. Kahn
Deputy Director
Narcotic Abuse Treatment Program
San Diego, California

Arnold M. Leff, M.D.
Health Commissioner
Cincinnati, Ohio

Arnold Mandel, M.D.
Chairman, Department of Psychiatry
University of California at San Diego
San Diego, California

Walter Minnick
Former Chief, Federal Drug Management
Office of Management and Budget
Washington, D.C. *Boise, Idaho*

Robert G. Newman, M.D.
Public Health Consultant
New York, New York



196

Msgr. William B. O'Brien
President, Daytop Village
New York, New York

Vernon D. Patch, M.D.
Director, City of Boston Drug Treatment Program
Boston, Massachusetts

Jean Peak
Faculty Member, Department of Psychiatry.
University of California at San Diego
San Diego, California

Mitchell S. Rosenthal, M.D.
President, Phoenix House
New York, New York

N. T. Schramm
Director, Narcotic Abuse Treatment Program
San Diego, California

Charles F. Schwep
President, Action Priorities, Inc.
New York, New York

Jacob Schut, M.D.
Director, Drug Abuse Rehabilitation Center
Philadelphia, Pennsylvania

David E. Smith, M.D.
Medical Director, Haight-Ashbury Medical Clinic
San Francisco, California

Michael Tate
Consultant, Arthur D. Little Co.
Washington, D.C.

Charles B. Wheeler, M.D.
Mayor
Kansas City, Missouri

James Q. Wilson
~~Professor of Government, Harvard~~
Former Chairman, President's
Advisory Council
Cambridge, Massachusetts
Organizations

California Conference of Methadone Programs
Drug Abuse Council, Inc.
National Governor's Conference
National Association of Counties
National Association of State Drug Abuse Coordinators
National Coordinating Council on Drug Education, Inc.
National League of Cities-U.S. Conference of Mayors

