

Justification for Change
“National Adult Tobacco Survey”
OMB No. 0920-0828, exp. 10/31/2010

The Centers for Disease Control and Prevention (CDC) requests OMB approval of a change request for the information collection entitled “National Adult Tobacco Survey.” The change includes the addition of one question seeking information on cigarette purchase patterns. This question will address initiatives set forth by the American Recovery and Reinvestment Act of 2009 (Recovery Act), signed into law February 17, 2009. The CDC’s state and territory initiative includes a statewide policy and environmental change component aimed at supporting healthy behaviors including decreasing tobacco use. One of the evidence based intervention areas that states can choose is pricing strategies such as increasing excise taxes on cigarettes to discourage tobacco use.

This Change request describes the following proposed modification:

1. Addition of question 29B to the National Adult Tobacco Survey Questionnaire

Question 29B is as follows: **In the past 12 months, that is, since [DATE FILL], have you bought cigarettes on an Indian reservation?**

- 1. YES**
- 2. NO**
- 7. DON’T KNOW/NOT SURE**
- 9. REFUSED**

Policy interventions to increase the unit price of tobacco products are an effective strategy to curtail tobacco initiation and increase cessation.^{1 2} However, efforts to offset higher product prices through excise tax avoidance and point-of-sale promotions significantly reduce the effectiveness of pricing interventions. Studies consistently demonstrate that smokers seek lower or no-tax venues such as the internet, military bases, out-of-state vendors, or Indian reservations to purchase cigarettes in response to state tax increases.^{3 4} Hyland, et.al noted that 67 percent of adult smokers in western New York in 2002-2003 reported usually purchasing cigarettes from an Indian reservation where the average cigarette price was 40 percent lower than off-reservation tobacco retailers.⁵ A related paper found that price avoidance strategies were associated with living within 40 miles of a state or Indian reservation with lower cigarette excise taxes and that “smokers who bought cigarettes from American Indian reservations were half as likely to make a quit attempt ...compared with those who bought full-priced cigarettes”⁶

Given existing evidence in this area, monitoring the proportion of adults who purchase tobacco products on Indian reservations will provide information to better understand the context and impact of policy interventions to increase tobacco excises taxes.

¹ Task Force on Community Preventive Services. The Guide to community preventive services: tobacco use prevention and control. American Journal of Preventive Medicine.2001;20 (Suppl 2):1-88.

² U.S. Department of Health and Human Services. Reducing tobacco use: a report of the Surgeon General. Atlanta, GA: Centers for Disease Control and Prevention; 2000.

³ Emery S, White MM, Gilpin EA, et al. Was there significant tax evasion after the 1999 50 cent per pack cigarette tax increase in California? Tobacco Control 2002;11:130-4.

⁴ Hrywna M, Delnevo CD, Staniewska D. Prevalence and correlates of internet cigarette purchasing among adult smokers in New Jersey. Tobacco Control 2004;13:296-300.

⁵ Hyland A, Higbee C, Bauer JE, et al. Cigarette purchasing behaviors when prices are high. Journal of Public Health Management and Practice 2004;10:497-500.

⁶ [Hyland A, Higbee C, Li Q, Bauer JE, Giovino GA, Alford T, Cummings KM](#). Access to low-taxed cigarettes deters smoking cessation efforts. [Am J Public Health](#). 2005 Jun;95(6):994-5.