

**ATTACHMENT K: 60-DAY FEDERAL REGISTER NOTICE (FRN)**

## K-1 60-day FRN Comment

## K-2 SAMHSA's Response to 60-day FRN Comment

**Attachment K-1**  
**60-day FRN Comment**



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 Legacy

Legacy appreciates the opportunity to comment on the Evaluation of Pregnant and Postpartum Women Program (PPW), and would like to attest to the practical utility of the program. Legacy is especially glad that SAMHSA has included questions concerning the use of cigars, cigarillos, and pipes as well as chewing tobacco, snuff, and dip. These questions will help to inform the participant of the dangerous nature of all tobacco products. At the same time we have a few suggestions to make the evaluation even more useful.

Legacy is a national, independent public health foundation created in 1999 out of the landmark 1998 Master Settlement Agreement (“MSA”) between the tobacco industry, 46 state governments and five U.S. territories. Our mission is to build a world where young people reject tobacco and anyone can quit. Legacy does not lobby or take positions on specific legislation. Our programs include:

**truth®** - A national youth smoking prevention media campaign responsible for preventing approximately 450,000 youth from beginning to smoke in its first four years<sup>i</sup>

**EX®** - An innovative smoking cessation public education campaign designed to help smokers “re-learn” life without cigarettes.

**Research Initiatives** – Examining the various causes and effects of tobacco use in the United States.

**Outreach to Priority Populations** – Priority Populations Initiatives and grants provide critical interventions using methods that are culturally competent and tailored for the specific needs of communities disproportionately affected by the toll of tobacco.

The negative health effects of tobacco use on pregnant women and their babies are well documented. Women who smoke are at a higher risk for pre-term delivery, low birth weight and their babies are at higher risk for sudden infant death syndrome (SIDS).<sup>ii</sup> The most recent data show that 16.4%<sup>iii</sup> of pregnant women ages 15-44 smoke cigarettes in the U.S. Researchers have found that in some cities, 25% of pregnant women over age 18 use cigarettes.<sup>iv</sup> For these reasons Legacy would like to advise the addition of four (4) questions to section A-16 Items Administered to Women of the Evaluation of Pregnant and Postpartum Women Program (PPW).



Section A-16 Items Administered to Women currently has three (3) questions regarding tobacco use, but the survey does not assess the number of cigarettes per day and does not assess quit attempts or successful quitting. In order to get this information, Legacy suggests adding the following questions:

1. During the past 30 days, on the days that you smoked, about how many cigarettes did you smoke per day?
2. During the past 12 months, did you ever seriously try to quit smoking cigarettes?
3. If yes, during the past 12 months, how many times have you tried to quit smoking for at least a day?
4. During the past 12 months, what was the longest length of time you stopped smoking because you were trying to quit smoking?

Legacy believes that the addition of these questions to Section A-16 will be useful in furthering the first of the PPW program's five core goals, the "Decrease the use and/or abuse of prescription drugs, alcohol, tobacco, illicit and other harmful drugs (e.g., inhalants) among pregnant and postpartum women."

The current survey asks respondents to quantify the number of days they have smoked. Measuring the number of cigarettes per day will supply further information on the level of cigarette use. This information will allow program researchers to more accurately measure the change in tobacco use over the course of the program.

Measuring the number and success of quit attempts allows program administrators to examine quit attempts and successful quitting as an outcome. The number of quit attempts and rate of successful quitting could provide valuable information on the effectiveness of the program in decreasing tobacco use.

Legacy believes that the addition of these questions would improve the PPW program evaluation and aid in the critical goal of decreasing tobacco use among pregnant and postpartum women. We applaud the program for the work it has done in this area. Please contact Stephenie Foster, Senior Vice President of Government Affairs at 202-454-5559 or [sfoster@legacyforhealth.org](mailto:sfoster@legacyforhealth.org), if you have questions or need more information.

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<sup>i</sup> Farrelly MC, Nonnemaker J, Davis KC, Hussin A. The Influence of the National truth Campaign on Smoking Initiation. *American Journal of Preventive Medicine*, 2009; 36(5): 379-384.

<sup>ii</sup> U.S. Department of Health and Human Services. The Health Consequences of Smoking. A report of the Surgeon General. Rockville, MD. U.S. Department of Health and Human Services, Public Health Service, Centers for Disease Control, Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health, 2004

<sup>iii</sup> SAMHSA (2009a). *Results from the 2008 National Survey on Drug Use and Health: National findings*. Rockville, MD: Office of Applied Studies, NSDUH Series H-36, HHS Publication No. SMA 09-4434

<sup>iv</sup> Arria, A.M., Derauf, C., LaGasse, L., et al. (2006). Methamphetamine and other substance use during pregnancy: Preliminary estimates from the infant development, environment, and lifestyle (IDEAL) study. *Maternal and Child Health Journal*; 10(3); 293-302

## **Attachment K-2**

### **SAMHSA's Response to 60-day FRN Comment**

## **SAMHSA's Response to 60-day Federal Register Notice Comment**

**Issue:** Legacy, a national, independent public health foundation which focuses on tobacco prevention and cessation commented on the Evaluation of Pregnant and Postpartum Women 60-day Federal Register Notice. Legacy commended the proposed inclusion of tobacco use items in the Evaluation, and suggested adding four additional questions to assess the number of cigarettes used, quit attempts, and successful quitting.

**Response:** Tobacco use items currently proposed for the Evaluation complement other substance use items on the Government Performance and Results Act (GPRA) tool. Pending approval by the Office of Management and Budget (OMB), CSAT will be able to collect similar information for alcohol, tobacco, and other drugs including number of days used and route of administration.

Although we would like to collect additional information for all of these substances, such as the attempts to quit and usage amounts, we must balance this interest against the specific goals of the Evaluation. It has been difficult to limit the items included in the Evaluation, as there is so much to learn about these programs, however in this case we will not include the proposed four additional items.