

**Attachment B-2**

**Summary of Public Comments and CDC Response**

**National Youth Tobacco Survey**

**Federal Register Notice:** A 60-day Notice was published in the *Federal Register* on June 15, 2011, Vol. 76, No. 115, pp. 34997-34998.

**Public Comment #1**

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**From:** Elaine Keller [mailto:ekeller@casaa.org]

**Sent:** Thursday, June 16, 2011 10:32 AM

**To:** OMB-Comments (CDC)

**Subject:** Proposed Data Collections - National Youth Tobacco Surveys (NYTS) 2012-2014

The Federal Register states that the public can obtain a copy of the data collection plans and instruments. Would you be so kind to send me a copy of the data collection plan and instruments that you plan to use in the next National Youth Tobacco Survey via email. Thank you.

Elaine D. Keller

The Consumer Advocates for Smoke-free Alternatives Association

(202) 241-9117

**CDC Response to Public Comment #1**

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CDC provided a draft copy of the Information Collection Request and questionnaires.

## **Public Comment #2**

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**Sent:** Saturday, June 18, 2011 6:01 PM

**To:** OMB-Comments (CDC); speakerboehner@mail.house.gov; sf.nancy@mail.house.gov;  
info@taxpayer.net; media@cagw.org

**Cc:** info@theteaparty.org; secretary@themorristownteaparty.org

**Subject:** public comment on federal register FW: this I950 spending needs to be curtailed in 2011

this is a I950 project. tobacco is legally sold in the usa. i do not think teh overburdened taxpayers of this country should be asked to pay for this survey so this notoriously do nothing agency can employ people to sit on their butts doing nothing all day that helps america. this is not a necessary survey. if tobacco use were outlawed, there might be a purpose here. with legal tobacco there is no purpose at all. this is wasted money. the budget for htis should be downsized to zero.  
jeanpublic address if required

[Federal Register Volume 76, Number 115 (Wednesday, June 15, 2011)]  
[Notices]  
[Pages 34997-34998]  
From the Federal Register Online via the Government Printing Office  
[www.gpo.gov](http://www.gpo.gov)  
[FR Doc No: 2011-14788]

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DEPARTMENT OF HEALTH AND HUMAN SERVICES  
Centers for Disease Control and Prevention  
[60-Day-11-0621]

## **CDC Response to Public Comment #2**

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CDC provided a courtesy reply.

**Public Comment #3**

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**Altria**  
Altria Client Services

Jane Y. Lewis, Ph.D.  
Senior Vice President  
Tobacco Regulatory & Health Sciences

August 12, 2011

Mr. Daniel Holcomb  
CDC Reports Clearance Officer  
1600 Clifton Road  
MS – D74  
Atlanta, GA 30333

Re: Proposed Data Collections Submitted for Public Comment and  
Recommendations: National Youth Tobacco Surveys (NYTS) 2012 – 2014 –  
Revision – National Center for Chronic Disease Prevention and Health Promotion  
(NCCDPHP), Centers for Disease Control and Prevention (CDC) (Federal  
Register, Vol. 76, No. 115 / Wednesday, June 15, 2011 / Notices)

Dear Mr. Holcomb:

Altria Client Services (ALCS)<sup>1</sup> offers the following comments and recommendations on the proposed revision of NYTS. We urge the U.S. Department of Health and Human Services (HHS) to take a broader approach to gathering population-level survey data than described in the June 15, 2011, Federal Register notice. Specifically, we ask HHS to (1) undertake a comprehensive review of existing national surveys of youth and adult tobacco use and other risky behaviors, and (2) apply the results of that review to optimize collection of population-level data required under the Family Smoking Prevention and Tobacco Control Act (FSPTCA).<sup>2</sup>

We support efforts to reduce underage tobacco use. We also support CDC's goal to expand the information collected through national surveys, such as NYTS, on youth and

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<sup>1</sup> Altria Client Services (ALCS) is making this submission on behalf of Philip Morris USA (PM USA) and U.S. Smokeless Tobacco Company (USSTC), and John Middleton Co. (JMC). ALCS provides certain services, including regulatory affairs, to the Altria family of companies. "We" is used throughout to refer to PM USA, USSTC, and JMC.

<sup>2</sup> FSPTCA calls for the assessment of "the risks and benefits to the population as a whole, including users and nonusers of the tobacco product, and taking into account '(A) the increased or decreased likelihood that existing users of tobacco products will stop using such products; and (B) the increased or decreased likelihood that those who do not use tobacco products will start using such products'" (Sec. 906 (d)(1), p. 19).

(<http://www.fda.gov/downloads/TobaccoProducts/GuidanceComplianceRegulatoryInformation/UCM237080.pdf>).

adult tobacco use and other risky behaviors.<sup>3</sup> We recognize that reliable and valid population-level data are essential to understanding a number of key tobacco-related issues. These include product perception, initiation, use, and cessation among adolescents and adults. Filling this need will depend on the use of data from national surveys. All current national surveys may have something to offer, but all are subject to certain limitations.<sup>4</sup>

There are overlaps and gaps in the questions posed by the national surveys. For example, several items about cigarette smoking on the NYTS 2009 questionnaire overlap directly with items in the 2011 National Youth Risk Behavior Survey (YRBS) and to varying degrees with items in the 2009 National Survey on Drug Use and Health (NSDUH). It is not clear that these overlaps are purposeful or add significant value. On the other hand, these same surveys tend to include only a few items regarding other tobacco products (e.g., smokeless tobacco, cigars and pipes). YRBS may be an extreme case: It includes only one item related to cigars.

Few surveys are designed to collect parallel data on youth and adults. NYTS collects data on youth, but it does not collect similar data on adults. The recently announced National Institute on Drug Abuse (NIDA) FSPTCA National Longitudinal Study of tobacco users<sup>5</sup> will collect data on adults, but it does not plan to collect related data on youth. A key benefit of collecting data on both youth and adults in the same survey is that it avoids difficulty in comparing results across surveys. In the case of the NIDA survey, it also may provide means to investigate issues that arise among youth, adults, or both in a timely and cost-effective manner.

Additionally, survey coverage of youth tobacco use is inconsistent. Some states, such as Texas, participate in multiple national and state-level surveys, administering YRBS in coordination with NYTS and the Youth Tobacco Survey (YTS).<sup>6</sup> Other states, such as Oregon, have less national involvement<sup>7</sup> and do not participate in either state-level survey. The Youth Risk Behavior Surveillance System (YRBSS) includes national, state, territorial and local surveys. CDC conducts the national survey, and education and health departments conduct surveys at the state, territory and local level.<sup>8</sup> It is unclear which

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<sup>3</sup> The National Center on Addiction and Substance Abuse at Columbia University (June 2011). Adolescent substance use: America's #1 Public Health Problem. Available at: <http://www.casacolumbia.org/templates/NewsRoom.aspx?articleid=631&zoneid=51>

<sup>4</sup> See also p. 4, Henningfield, J. E., Hatsukami, D. K., Zeller, M., & Peters, E. (2011). Conference on abuse liability and appeal of tobacco products: Conclusions and recommendations. *Drug and Alcohol Dependence*, 116 (1-3), 1-7.

<sup>5</sup> Request for Proposal No. N01DA-11-5568, "Family Smoking Prevention and Tobacco Control Act National Longitudinal Study," Office of Acquisitions, National Institute on Drug Abuse, NIH, Bethesda, MD.

<sup>6</sup> Youth Tobacco Survey (YTS); <http://www.dshs.state.tx.us/tobacco/txyts.shtml>.

<sup>7</sup> See Figure 3.1, p. 78, [http://monitoringthefuture.org/pubs/monographs/mtf-vol11\\_2010.pdf](http://monitoringthefuture.org/pubs/monographs/mtf-vol11_2010.pdf)

<sup>8</sup> Centers for Disease Control and Prevention (2004, September 24). Methodology of the Youth Risk Behavior Surveillance System. *MMWR*, 53, No. RR-12.

states participate in YTS, and there are some notable differences in how national and state surveys ask questions.<sup>9</sup>

Before modifying NYTS, we urge HHS to engage stakeholders and experts in a comprehensive review of the national surveys of youth and adult tobacco use and other risky behaviors. The goal of the review would be to understand which data are most important and the best way to collect them. Specifically, it would:

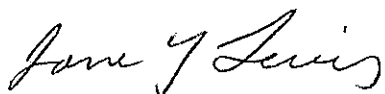
- Consider the strengths and limitations of the existing surveys, individually and relative to each other;
- Evaluate each survey's purpose, scope, contents, operational procedures, sample populations, data analysis, and reporting;
- Assess data quality issues as well as survey limitations, budgetary and support constraints;
- Identify unmet data requirements and opportunities to address those requirements through new or existing surveys;
- Identify areas for potential synergy, considering recent initiatives that have been launched (e.g., NIDA FSPTCA National Longitudinal Study) and technological advances that have occurred since the surveys were first developed; and
- Apply the results of this review to establish a comprehensive survey system that collects the population data needed for tobacco regulatory decisions under the FSPTCA.

We would be happy to meet with you to discuss our suggestions in more detail.

If you have questions, please contact me at (804) 335-2202.

Thank you.

Sincerely,



Dr. Jane Y. Lewis  
Senior Vice President  
Tobacco Regulatory & Health Sciences

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<sup>9</sup> Terchek, J. J., Larkin, E. M. G., Male, M. L., & Frank, S. H. (2009). Measuring cigar use in adolescents: Inclusion of a brand-specific item. *Nicotine & Tobacco Research*, 11, 7, 842-846. Also see <http://healthyouthva.org/vtsf/data/youth-tobacco-survey.asp>

**CDC Response to Public Comment #3**

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CDC acknowledged receipt and consideration of the comments.