



Mr. David Dobbins, JD Chief Operating Officer Legacy for Health 1724 Massachusetts Ave, NW Washington, DC 20036

Re: Comments on the 2013 National Survey on Drug Use and Health

Dear Mr. Dobbins:

Thank you for your continued interest in the National Survey on Drug Use and Health and for your thoughtful suggestions for the tobacco module. These issues are important and we remain in agreement that they should be studied.

As you are aware, SAMHSA is planning a questionnaire redesign for the 2015 NSDUH. During the planning for this redesign, it was decided that the questionnaire should remain constant, allowing only for minor updates and revisions until 2015. The content of the redesigned questionnaire was determined based on consultation with Federal agencies and other data users. As we indicated in our previous response, several new items were developed for the tobacco module in the early stages of the redesign. However, SAMHSA and the Office of National Drug Control Policy (ONDCP) within the Executive Office of the President maintain the position that preserving trends is imperative to the continued success of the study. With that in mind, a firm decision has been made to leave the core drug modules essentially unchanged, with the exception of prescription drug modules, in the redesigned questionnaire as well.

Altering questions within a module has the potential to cause unintended context effects on subsequent questions. We have seen this effect in non-core modules where the simple deletion of one question caused significant changes in the responses to the questions that followed. Making the types of additions you suggest could introduce these types of effects and disrupt trends within the tobacco or successive modules for other substances. Nevertheless, SAMHSA continues to explore these topics for future non-core modules and maintains communications with the FDA and the Office on Smoking and Health to remain well-informed of emerging tobacco issues.

## Dobbins - Page Two

As always, we appreciate and welcome your comments and input. If you have any questions, please let us know.

H. Westley Clark, M.D., J.D., M.P.H., CAS, FASAM Director, Center for Behavioral Health Statistics and Quality