

Change Request
2020 National Youth Tobacco Survey (NYTS)
(OMB no. 0920-0621, approved 04/30/2018, exp. date 04/30/2021)

Date of Request: March 29, 2019
OMB approval is requested by: December 1, 2019

Summary

The NYTS is the only nationally representative survey of middle and high school students that focuses exclusively on tobacco use patterns and associated factors. The NYTS has been conducted periodically since 1999 and annually starting in 2011. Information collection employs a repeat cross-sectional design to develop national estimates of tobacco use and its correlates, including exposure to pro- and anti-tobacco influences among youth. The survey is administered by CDC's Office on Smoking and Health (OSH) in collaboration with FDA's Center for Tobacco Products (CTP). NYTS data are principally used to generate tobacco-related measures that inform (1) CDC's public health programs and activities, and (2) CTP's regulatory activities. The content of the NYTS questionnaire is largely consistent, however in a given year, a subset of questions may be added and others removed to reflect changes in the tobacco product landscape as well as to address emergent data needs. In 2019, the NYTS transitioned from a paper-and-pencil survey mode to a digital-based data collection mode. This has allowed for the programming of skip instructions to tailor questions to individual respondents' tobacco product use behaviors, improving both the validity of responses and the overall detail of the data collected.

We request the following:

OMB approval of revised NYTS questionnaire content for 2020. See **Attachment I-1**, *National Youth Tobacco Survey 2020 Questionnaire*. Changes relative to the 2019 version of the questionnaire are summarized in **Attachment I-2**, *Crosswalk of Non-Substantive Questionnaire Changes, 2019 to 2020 NYTS*.

There are no changes to the sampling plan, recruitment methods, estimated burden per response, or total estimated burden hours.

Background and Justification

The NYTS is a cross-sectional questionnaire administered to U.S. middle and high school students in grades 6-12. A probability based, nationally representative sample is used to select schools; within selected schools, classes are randomly selected and all students in the selected classed are eligible to participate. In order to minimize the burden on the schools and students the NYTS is completed in one class period.

Since its initiation in 1999, the NYTS had been completed using a paper and pencil administration. However, after the successful completion of an electronic pilot survey in 2018, the NYTS was fully transitioned to a digital-based survey mode in 2019. This transition allowed for the programming of skip instructions to tailor the questionnaire to respondents' individual tobacco product use status. In addition to improving both the overall detail and validity of responses, this transition is expected to

result in reduced burden time, as individuals are not asked to read through and answer questions that are not applicable to their current tobacco product use behaviors.

To comply with the terms of clearance for the currently approved ICR, CDC is requesting approval for non-substantive changes to the 2019 NYTS that will modify the instrument to maintain relevance with emerging tobacco product use behaviors among youth for 2020. If approved, the proposed modified instrument will be implemented in 2020 to collect comprehensive information that will inform public health and regulatory activities.

New areas of emphasis for the 2020 NYTS include:

- Updating the brand examples for tobacco products based on current market-scan data
- Reinstating questions on:
 - Harm and addiction perceptions, cigars/little cigars/cigarillos (last asked in 2016)
 - Peer use perceptions, cigarettes and e-cigarettes (last asked in 2016)
 - Interactions with health care professionals, tobacco product use (last asked in 2015)
 - Marijuana use in e-cigarettes (last asked in 2018)
- Adding questions on:
 - Any brand(s) used for cigarettes and e-cigarettes in the past 30 days
 - Awareness of nicotine content in e-cigarettes
 - Interactions with health care professionals regarding e-cigarette use
 - Cessation behaviors specific to e-cigarettes
 - Awareness of warning labels on cigarette packages
 - Exposure to social media posts regarding e-cigarettes
 - Exposure to secondhand smoke and secondhand aerosol specific to outdoor settings
 - Sexual orientation, known to be associated with tobacco product use (youth and adults)

The order of tobacco product sections has been revised to reflect the current prevalence of use among youth, with questions about e-cigarette use being asked first, followed by cigarettes, cigars, smokeless tobacco, hookah, other tobacco products, and heated tobacco products. Furthermore, existing questions assessing ever use of individual tobacco products have been modified from “ever tried smoking” to “ever smoked” to more accurately reflect actual first use (versus attempt to use). Finally, the existing sections on flavored tobacco product use (2 questions) and access to tobacco products (2 questions) have been modified to take advantage of the digital-based mode of survey administration. Changes have been proposed to make these four questions tobacco product-specific in order to provide a more nuanced assessment of behaviors toward flavored use and access to products. Similarly, programming instructions have been introduced or modified throughout the survey to tailor questions based on individuals’ self-reported tobacco product use behaviors.

These requested changes provide the opportunity for new survey content and incremental improvements to existing wording on the approved instrument in a manner such that the overall content remains consistent with topics covered in previous versions of the instrument and align with the current terms of clearance. The introduction of skip instructions in the digital-based survey also increases data quality by tailoring some survey questions to respondents’ individual tobacco product use status. Overall, these proposed changes will improve the quality of the survey and relevance with emerging tobacco use behaviors and control policies.

In summary, this change request includes the addition of 12 new questions and the reinstatement of 7 questions from previous cycles of the NYTS. The deletion of 6 existing questions from the 2019 survey result in a net gain of 13 survey questions between 2019 and 2020. However, the programmed skip instructions for 2020 will limit any resulting gains in overall respondent burden by eliminating the need for respondents to read through and answer non-applicable questions based on their tobacco product use status. Thus, not all respondents will be asked all 117 survey questions, and any non-applicable responses (ex. "I have never smoked a cigarette, not even a puff") have been removed, further reducing respondent burden.

The full-scale digital-based 2019 NYTS survey began fielding in mid-February 2019. Preliminary estimates of response time burden suggest that the average time to complete the 2019 survey (104 questions, with programmed skip instructions) is about 13 minutes. Fielding staff report that the total time to complete the classroom data collection is 15-20 minutes, inclusive of giving verbal instructions. As noted, the allotted burden time for the digital-based survey has not changed from when the NYTS was administered by paper-and-pencil, allowing for one class period (up to 45 minutes) for survey completion. Thus, it is estimated that the time to complete the 2020 questionnaire will not exceed the burden time from the previous administration in 2019 and the overall respondent burden has been kept at the same level. The newly proposed questions are essential to maintain relevance with emerging tobacco products, behaviors, attitudes, and policies.

The 2020 NYTS questionnaire is provided as Attachment I-1.

Changes from the 2019 version of the questionnaire are summarized in Attachment I-2.

Inter-agency Coordination and Agency Points of Contact

In the fall of 2011, OSH and the Center for Tobacco Products (CTP) at FDA entered into a collaboration to conduct the NYTS on an annual basis, with each agency funding alternate years. OSH and CTP agreed that in order to minimize unnecessary duplication and redundancy, they would collaborate to leverage the NYTS to meet both agencies' goals. The collaboration agreement between OSH and CTP is that the content of NYTS will be decided collaboratively to meet the needs of both agencies. The agreement is described in the Supporting Statement for the current NYTS clearance (see Section A.4, "NYTS instrument content is decided in collaboration between CDC and FDA in order to inform CDC's non-regulatory public health approaches, and inform FDA's regulatory activities. Thus, the survey is specifically being designed to avoid duplication while meeting the needs of both agencies. Since the 2015 NYTS, the CDC and FDA established a working group to obtain guidance and suggestions for new items on the questionnaire that would help facilitate the measurement of key data needed to address the mission of both agencies.").

HHS established a working group on tobacco to improve the coordination, efficiency, and usability of information collected for surveillance, research, regulatory action, and program management. The working group includes representation from ASPE, CDC, FDA, NIH, and SAMSHA. The 2020 NYTS draft questionnaire was distributed for comment to representatives from the HHS tobacco working group, as well as to other partners such as NCHS and the CDC YRBS program. The 2020 NYTS Questionnaire submitted for OMB approval reflects CDC and FDA priorities.

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Requested OMB Approval Date and Rationale

OMB approval is requested by December 1, 2019. Approval by this date will support logistical preparations for the digital-based data collection procedures. High participation rates are important because the sampling frame does not allow for replacement of schools that choose not to participate. Therefore, lead time is needed to:

- (a) Program, test, and load the updated 2020 NYTS questionnaire onto the tablets used for the digital-based survey. CDC and the data collection contractor are unable to complete these programmatic activities until the questionnaire content is finalized and approved by OMB. Adequate lead time is required to allow CDC and the data collection contractor time to coordinate these activities and allow for testing of the new digital-based questionnaire in an efficient and cost-effective manner.
- (b) Coordinate with the data collection contractor to print and distribute supplementary materials (e.g., permission forms). Production and distribution of these materials may be complicated by end-of-year holidays or inclement weather. Adequate lead time is required to coordinate survey logistics in an efficient and cost effective manner.
- (c) The production schedule for NYTS materials also affects school participation. Year-end in-school testing often conflicts with data collection activities, particularly during the later months of the data collection period (April, May, and June). Thus, many schools prefer earlier data collection dates so as not to disrupt test preparation and administration activities. However, many schools are unable to confirm their participation without guaranteed survey administration dates.

Estimated Timeline

12/01/2019	Target date for receipt of OMB approval
12/02/2019	Begin programming of 2020 NYTS digital-based survey (data collection contractor)
December, 2019	Submit print order for supplementary materials (permission forms) to CDC/MASO with print due dates of Mid-January
Mid-January 2020	Initiate distribution of printed supplementary materials to selected schools and survey administrators
02/03/2020	Target for initiation of information collection for selected schools
June 2020	Complete information collection