

2020 NSDUH, Supporting Statement
Attachment X – Comment Received

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August 12, 2019

Janet Heekin
SAMHSA Reports Clearance Officer
Room 15E21B
5600 Fishers Lane
Rockville, MD 20857

**Re: 2020 National Survey on Drug Use and Health Clinical
Validation Study and Redesign Field Test (OMB No. 0930-
0110) – Revision to 2019 NSDUH collection**

Dear Ms. Heekin:

Truth Initiative® welcomes the opportunity to submit comments on the 2020 National Survey on Drug Use and Health Clinical Validation Study and Redesign Field Test. We value the data this survey provides as we examine trends in the use of different tobacco products in the U.S.

Truth Initiative is committed to creating a generation of Americans for whom tobacco use is a thing of the past. Truth Initiative's flagship program is the proven-effective and nationally recognized youth smoking prevention campaign, truth®. Other programs include EX®, an innovative smoking cessation program; research initiatives exploring the causes, consequences and approaches to reducing tobacco use; and programs to address the health effects of tobacco use – with a focus on priority populations disproportionately affected by the toll of tobacco. Our cessation program for young adults, This is Quitting, originally designed to help young people quit smoking, has been updated to be the first-of-its kind to help young people quit e-cigarettes.

Truth Initiative appreciates SAMHSA for the addition of lifetime and recency questions about vaping nicotine or tobacco to the 2020 NSDUH but would like to suggest changes to the wording of these questions.

Since their introduction in the United States market, awareness, interest and use of electronic cigarettes (e-cigarettes) has steadily grown. It is important to gather information about the prevalence of these products, especially as a relatively new high-nicotine product, JUUL, has become so popular that it has captured 73.4 percent of the e-cigarette market.¹ A Truth Initiative study found that 25 percent of survey respondents aged 15 to 24 recognized a JUUL e-cigarette



device when shown a photo of the product. Among those who recognized JUUL, 25 percent reported that use of this product is called “JUULing,” indicating that this product is so distinctive, it is perceived as its own category.² Additional research from Truth Initiative shows that youth ages 15 to 17 have over 16 times greater odds of being current JUUL users compared to those between 25 and 34 years old.³ Thus, it is incredibly important to ask about e-cigarette use on the National Survey on Drug Use and Health.

VPINTRO

We recommend changing the wording of the introduction to the vaping section to include brand names, which is consistent with CDC’s National Youth Tobacco Survey (NYTS). Currently, the NSDUH introduction states: The next questions are about vaping nicotine with e-cigarettes or other vaping devices. These devices might also be called vape pens, personal vaporizers, or mods. When answering, please include any device that heats a liquid containing nicotine into a vapor. The NYTS states: “The next questions are about electronic cigarettes or e-cigarettes. E-cigarettes are battery powered devices that usually contain a nicotine-based liquid that is vaporized and inhaled. You may also know them as e-cigs, vape-pens, hookah-pens, e-hookahs, e-cigars, e-pipes, personal vaporizers, or mods. Some brand examples include JUUL, NJOY, Blu, Vuse, MarkTen, Logic, Vapin Plus, eGo, and Halo.” We recommend changing the phrase “vaping nicotine” throughout this section to “using an e-cigarette or other vaping device with nicotine” as some youth do not know that these products contain nicotine. Additionally, it is important to include brand examples because some youth do not know that these products contain nicotine.²

VPLIF and VPLIFREF

Have you ever, even once, vaped nicotine with an e-cigarette or other vaping device?
We recommend changing this question to: “Have you ever, even once, used an e-cigarette or other vaping device with nicotine?”

VPFT

How old were you the first time you vaped nicotine with an e-cigarette or other vaping device?

We recommend changing this question to: “How old were you the first time you used an e-cigarette or other vaping device with nicotine, even one or two times?”

VPFTYRa and VPFTYRb

Did you first vape nicotine with an e-cigarette or other vaping device in...

We recommend changing this question to: “Did you first use an e-cigarette or other vaping device with nicotine in...”

VPFTMOa and VPFTMOb

In what month in...did you first vape nicotine with an e-cigarette or other vaping device?

We recommend changing this question to: “In what month in...did you first use an e-cigarette or other vaping device with nicotine?”



VPPM

Now think about the past 30 days, that is, from [DATEFILL] up to and including today. During the past 30 days, have you vaped nicotine with an e-cigarette or other vaping device?

We recommend changing this question to: “Now think about the past 30 days, that is, from [DATEFILL] up to and including today. During the past 30 days, have you used an e-cigarette or other vaping device with nicotine?”

VPREC

How long has it been since you last vaped nicotine with an e-cigarette or other vaping device?

We recommend changing this question to: “How long has it been since you last used an e-cigarette or other vaping device with nicotine?”

VPRECDK

What is your best guess of how long it has been since you last vaped nicotine with an e-cigarette or other vaping device?

We recommend changing this question to: “What is your best guess of how long it has been since you last used an e-cigarette or other vaping device with nicotine?”

VPRECREP

How long has it been since you last vaped nicotine with an e-cigarette or other vaping device?

We recommend changing this question to: “How long has it been since you last used an e-cigarette or other vaping device with nicotine?”

VPPMNUM

During the past 30 days, that is, since [DATEFILL], on how many days did you vape nicotine with an e-cigarette or other vaping device?

We recommend changing this question to: “During the past 30 days, that is, since [DATEFILL], on how many days did you use an e-cigarette or other vaping device with nicotine?”

VPPMNUNR

What is your best estimate of the number of days you vaped nicotine with an e-cigarette or other vaping device during the past 30 days?

We recommend changing this question to: “What is your best estimate of the number of days you used an e-cigarette or other vaping device with nicotine during the past 30 days?” Additionally, the answers to this question should be continuous, not categorical. For analyses purposes, a continuous measure of use would allow for stronger models, and would still allow for data to be collapsed into categories, thus allowing for flexibility in analyses. Thus, the options in answering should be as follows:

1 0 days



2	1 day
3	2 days
4	3 days
5	4 days
6	5 days
7	6 days
8	7 days
9	8 days
10	9 days
11	10 days
12	11 days
13	12 days
14	13 days
15	14 days
16	15 days
17	16 days
18	17 days
19	18 days
20	19 days
21	20 days
22	21 days
23	22 days
24	23 days
25	24 days
26	25 days
27	26 days
28	27 days
29	28 days
30	29 days
31	All 30 days

Additional Questions

We recommend adding a question asking about the type of e-cigarette used. This question should include photos with the answer choices. The CDC has asked this question in the following way:

Which of the following best describes the type of e-cigarette or other vaping device with nicotine you have used in the past 30 days? If you have used more than one type, please think about the one you use most often.

1. A disposable e-cigarette
2. An e-cigarette that uses pre-filled pods or cartridges (e.g. JUUL)
3. An e-cigarette with a tank that you refill with liquids
4. A mod system (an e-cigarette that can be customized by the user with their own combination of batteries or other parts)



5. I don't know the type

We also recommend adding a question asking about the brand of e-cigarette used. We have inserted below the top e-cigarette brands by market share.¹

The next question is about the brand of e-cigarette you use. During the past 30 days, what brand of e-cigarettes did you use most often?

- 1 JUUL
- 2 Vuse
- 3 Blu
- 4 Logic
- 5 NJOY
- 6 Vapin Plus
- 7 A brand not on this list

Thank you for considering these comments and recommendations. These changes will improve the quality and utility of the National Survey on Drug Use and Health. If you have questions or need more information, please contact Maham Akbar, Manager of Public Policy at Truth Initiative, at makbar@truthinitiative.org or 202-454-5932.

Sincerely,

M. David Dobbins
Chief Operating Officer



References

1. Bonnie Herzog. Wells Fargo Securities Equity Research. Nielsen: Tobacco All Channel Data Thru 7/13. July 23, 2019.
2. Willett JG, Bennett M, Hair EC, et al. Recognition, use and perceptions of JUUL among youth and young adults. *Tobacco control*. 2018.
3. Vallone DM, Bennett M, Xiao H, Pitzer L, Hair EC. Prevalence and correlates of JUUL use among a national sample of youth and young adults. *Tobacco control*. 2018.

2020 NSDUH, Supporting Statement
Attachment Y – SAMHSA’s Response to
Comment

September 10, 2019

Mr. M. David Dobbins
Chief Operating Officer
Truth Initiative
900 G Street, NW
Fourth Floor
Washington, DC 20001

Dear Mr. Dobbins

Re: 2020 National Survey on Drug Use and Health Clinical Validation Study and Redesign Field Test (0930-0110)

Thank you for your interest in the new vaping items we plan to test in the NSDUH 2020 redesign field test. Also, thank you for your suggestions on item content and wording. We have wrestled with many of the issues you have raised. Our decisions about the best approaches to take when asking items about vaping nicotine were influenced by advice received from expert advisory panel members. Expert advisors were particularly helpful as we identified key measurement goals, and they made useful suggestions for draft item wordings. In addition, we tested alternative item wordings in cognitive interviews with both youth and adult volunteer participants recruited to reflect the breadth of our respondent population. The cognitive interview results helped us refine item wordings to ensure redesign items capture the intended measurement goals.

Background

As you know, the National Survey on Drug Use and Health (NSDUH) is designed to provide prevalence estimates for substance use across a range of substances and time frames. A major goal is to establish and maintain trends in estimated prevalences between redesigns. In undertaking the current redesign, an important consideration has been monitoring changes and using available literature and external experts to help us anticipate developments in the area of substance use that are likely to be of interest in 2025 and beyond. Vaping represents a challenge because it is not a substance, but rather a mode for ingesting substances. Nicotine is one substance that can be ingested by vaping, but it is not the only substance that can be ingested by vaping. The distinction between a substance and a mode for ingesting various substances was central in decisions made about how to word vaping items. NSDUH's mission is to estimate trends in substance use. In NSDUH, mode of administration is of interest because questions about modes of administration will help respondents provide complete reports of the substances used.

Based on your careful review, we identified two general issues influencing item wordings across the full set of items on vaping nicotine. The two general issues are:

- Measuring substances delivered contrasted with measuring electronic delivery devices used to deliver them, and

- Using brand names to help identify delivery devices

In addition you suggested the following item-specific considerations:

- Revising item VPPMUNR to use a continuous rather than categorical response scale, and
- Adding items to measure the types of vaping devices and brands used most often, possibly using photographs to help respondents identify their delivery devices.

This document begins by considering the first two general issues listed above, and then turns to the latter two item-specific issues raised by your review.

Measuring devices contrasted with measuring substances

Based on input from expert panel members, we chose item wordings that focused on vaping as an activity rather than on the electronic delivery systems used to vape nicotine. It is possible that in the context of a tobacco survey, respondent reports about their use of electronic delivery devices will include only tobacco- or nicotine-based vaping. Thinking about the larger NSDUH context, expert panel members were unequivocal in their assessment that if we focus items on the delivery systems, we should **not** assume that the vaping reported is restricted to tobacco or nicotine products. Electronic delivery systems, including JUUL, are easily modified to deliver other substances and can also be used to deliver only flavoring, without the addition of tobacco or other drugs. Notably for NSDUH, marijuana is one substance that can be vaped using electronic delivery systems¹. There are reports of other substances delivered via electronic delivery systems,² and we anticipate that users' creativity in adapting these devices will spur even more cross-over from nicotine delivery to the delivery of other substances.

For VPINTRO, We selected the wording, "The next questions are about vaping **nicotine**" because we want respondents to report only nicotine use. Items later in the survey ask more general questions about vaping other substances using electronic delivery systems.³

Items VPLIF, VPLIFFFREF, VPFT, VPFTYRa and VPFTYRb, VPFTMOa and VPFTMOb, VPPM, VPREC, VPRECCK, VPRECFREF, VPPMNUM, and VPPMUNR all ask about 'vaping nicotine' rather than 'using an e-cigarette or other vaping device' for the same reason – to elicit reports of **nicotine use** and **only** nicotine use. Additionally, the expert panel agreed that the wording should emphasize the action of vaping, rather than asking about 'using an e-cigarette or other

¹ Johnston, L. D., Miech, R. A., O'Malley, P. M., Bachman, J. G., Schulenberg, J. E., & Patrick, M. E. (2019). Monitoring the Future national survey results on drug use 1975-2018: Overview, key findings on adolescent drug use. Ann Arbor: Institute for Social Research, University of Michigan. (<http://monitoringthefuture.org//pubs/monographs/mtf-overview2018.pdf>; accessed Aug 29 2019)

² Breitbarth, A.K., Morgan, J. & Jones, A.L. (2018). E-cigarettes – An unintended illicit drug delivery system. Drug and Alcohol Dependence, 192, 98-111. (<http://monitoringthefuture.org//pubs/monographs/mtf-overview2018.pdf>, accessed Aug 29, 2019).

³ (SPDONTR1, the introduction to the set of more general vaping items says, "The next questions are about vaping flavoring and other substances using e-cigarettes or other vaping devices.")

vaping device’ because the action of vaping was likely to be the most universally understood and stable terminology for the desired measure. While the specific devices and brands are evolving quickly, the term ‘vaping’ to refer to use of any of these devices appears to be consistent.

Cognitive testing with these items indicates that adolescent and adult respondents understand the items as intended. The focus on “vaping nicotine” does not seem to confuse cognitive interview respondents or throw them off track. (The experts also confirmed your observation that people, particularly youth, do not always know what substances they are consuming with their electronic delivery systems.)

Using brand names or pictures to help identify delivery devices

In general, NSDUH avoids using brand names in item wording other than for prescription drugs. Expert panel members discussed the pros and cons of including specific brand names for electronic delivery systems. While experts agreed that brand names can be useful for facilitating recall, it was decided not to include brand names because the market is rapidly changing.⁴ The redesigned NSDUH should be worded to be relevant in 2025 and it should remain consistent and relevant over the years that follow in order to maintain trends. It cannot be assumed that JUUL and other currently popular devices will continue to be the most popular brands into the future, particularly given the present uncertainty about legal status and FDA standing. Finally, there is a class of heat-not-burn products under review by the FDA, and it is unclear what effect these products will have on the marketplace. Brand names were avoided in order to ensure that NSDUH items remain relevant as the marketplace changes. For similar reasons, it was decided to avoid using pictures to illustrate various types of electronic delivery systems. The latter point about pictures is related to the suggestion to add an item on type of electronic delivery system used most often in the past 30 days.

Instead of relying on brand names or pictures, VPINTRO gives a few generic examples of electronic delivery systems and focuses on the **function** of the delivery device – heating a liquid into a vapor for ingestion. (VPINTRO: “These devices might also be called vapes, vape pens, or mods. When answering, please include any device that heats a liquid **containing nicotine** into a vapor“.) Additionally, expert panel members considered using terminology from the PATH study describing how vaping devices work, but ultimately the majority of experts recommended against it.

Cognitive testing with this introduction and the items that follow indicates that adolescent and adult respondents understand the introduction and items as intended. We have observed no clear patterns of under- or over-reporting for vaping based on how the devices are described.

⁴ E.g., The New York Times, <https://www.nytimes.com/2019/08/13/health/juul-flavors-nicotine.html>, accessed 15Aug2019.

Revising item VPPMNUMR

Item VPPMNUMR is a follow-up to item VPPMNUM:

VPPMNUM asks, “During the past 30 days, that is, since [DATE THAT IS 30 DAYS PRIOR TO INTERVIEW DATE], on how many days did you vape nicotine with an e-cigarette or other vaping device?

_____ days in the past 30 days [RANGE: 1-30]

VPPMNUM gathers an open-ended, continuously scaled response for number of days in the past 30 days. VPPMNUMR is asked only of respondents who either (1) answer “don’t know” at VPPMNUM or (2) refuse to answer VPPMNUM. The goal of VPPMNUMR is to encourage respondents to give some kind of estimate of days vaped nicotine in the past 30 days when they don’t give a continuous response at VPPMNUM. We use response categories in the follow up item to encourage **some** kind of report by making the recall task easier and the reporting potentially less sensitive.

Adding a measure of vaping devices used most often

As noted above, NSDUH estimates focus on substances rather than mode of administration. Even if we know what device respondents use most often, we don’t know what substances were used. The redesigned NSDUH items refer to devices and delivery modes to prompt complete reports for substances.

Also, we already mentioned rapid changes in the marketplace for electronic delivery systems. At this time, it is difficult to identify a set of response options that will (1) be appropriate for 2025 and (2) remain consistently appropriate after 2025.

Sincerely,

Peter Tice
NSDUH Project Officer
Center for Behavioral Health and Survey Quality, SAMHSA