

Change Request
2022 National Youth Tobacco Survey (NYTS)
(OMB no. 0920-0621, approved 01/14/2021, exp. date 01/31/2024)

Date of Request: March 29, 2021
OMB approval is requested by: November 1, 2021

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. Information collection employs a repeat cross-sectional design to develop national estimates of tobacco use and its correlates. The survey is administered by CDC's Office on Smoking and Health (OSH) and funded 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 tobacco prevention and control policies and programs, and (2) CTP's regulatory activities.

Given the unprecedented circumstances presented by the COVID-19 pandemic, 2021 NYTS was approved to be administered as a virtual (web-based) survey. The terms of clearance for 2021 included a clause stating that CDC would seek OMB approval to continue using the virtual (web-based) for the 2022 data collection if the pandemic continues to affect data collection methods.

We request the following:

Given the continued challenges associated with on-campus data collection resulting from the COVID-19 pandemic, we request OMB approval to collect the 2022 NYTS as a virtual (web-based) survey using the same methodology as was approved for the 2021 administration. No changes to the currently approved 2021 NYTS questionnaire are requested.

Given the modest increase in burden on schools to assist with the logistics of providing the web-link to students and working with a virtual NYTS technical assistance provider (TAP) to ensure a successful administration, we request that the schools be given \$750 in appreciation for their participation in NYTS, which is in alignment with previous years of NYTS implementation (1999-2006: \$1,000; 2009, 2011-2021: \$500). We would also like to offer a \$50 gift card to teachers for their contribution in monitoring the administration and providing administrative information about the experience. No payments will be offered or made to student respondents, consistent with previous administrations.

OMB first suggested that CDC offer school incentives on school-based surveys as a means of improving school response rates and, thereby, improving the generalizability of results. Increasingly in recent years, school-based data collections, most of which do not fall under OMB review, have offered financial incentives to increase or maintain school participation rates. CDC believes that offering school/teacher incentives helps maintain, or slightly increase, school participation rates despite the growing number of competing, non-instructional demands placed on schools, including standardized testing. This is especially true during this unprecedented time of the COVID-19 pandemic. The incentive will also encourage the teachers to improve completion of an enrollment form that provides critical information about their students' eligibility and reasons for non-participation, such as providing the number of students who could not take the survey due to lack of internet access.

There are no changes to the sampling plan, recruitment methods, estimated burden per response, and no increase in the 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 2019, the NYTS has been administered electronically. 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 resulted in reduced time to complete the survey.

Furthermore, the electronic survey allowed the opportunity to continue data collection in a virtual environment for the 2021 administration, to account for changing school instructional models as a result of the COVID-19 pandemic. For the current 2020-2021 academic year, many schools continue to operate under alternative instructional models that include both in-person as well as distance learning. Additionally, there may be lasting effects on school operating procedures moving forward which may affect the 2022 data collection procedures. For example, schools may continue having restrictive visitor policies that may not allow data collectors to enter schools, or schools may have policies that restrict the sharing of supplies (such as project tablets) among pupils.

To comply with the terms of clearance for the currently approved ICR, CDC is requesting approval for a non-substantive change to collect the 2022 NYTS as a virtual (web-based) survey using the same methodology as the approved 2021 administration. If approved, this will allow CDC to maintain annual data collection while responding to schools' changing operating procedures because of the COVID-19 pandemic.

No changes to the survey instrument are requested for the 2022 NYTS administration.

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 fund 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.”).

David M. Homa, PhD, MPH
CDC
(770) 488-3626
DHoma@cdc.gov

Eunice Park-Lee, PhD, MPH
FDA
(301) 837-7342
Eunice.Park-Lee@fda.hhs.gov

Requested OMB Approval Date and Rationale

OMB approval is requested by November 1, 2021. 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 2022 NYTS questionnaire into the digital-based (web) survey. CDC and the data collection contractor are unable to complete these programmatic activities until the questionnaire content and data collection procedures are 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 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, factsheets, virtual administration materials). 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. End of year testing schedules 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

11/01/2021	Target date for receipt of OMB approval
11/02/2021	Begin programming of 2022 NYTS digital-based survey (data collection contractor)
12/01/2021	Initiate distribution of printed supplementary materials to selected schools and survey administrators
01/15/2022	Target for initiation of information collection for selected schools
05/31/2022	Complete information collection