



September 18, 2020

Carlos Graham
Substance Abuse and Mental Health Services Administration
Department of Health and Human Services
5600 Fishers Lane
Rockville, MD 20857

Dear Mr. Graham:

On behalf of the American Academy of Family Physicians (AAFP), which represents 134,600 family physicians and medical students across the country, we write in response to the [request for comments](#) on the proposed National Substance Use and Mental Health Services Survey (N-SUMHSS) (OMB No. 0930–) from the Substance Abuse and Mental Health Services Administration (SAMHSA), as requested by the Department of Health and Human Services (HHS) in the August 20, 2020 *Federal Register*.

Tobacco continues to be [the leading preventable cause of disease, disability, and death in the United States](#). Adults with behavioral health disorders (i.e., a mental health or substance use disorder) are [disproportionately affected by tobacco use](#). Nearly [40% of all cigarettes consumed in the U.S. are consumed by people with behavioral health disorders](#), despite only representing 25% of the adult population.

[Over 70% of people who use tobacco products see a physician each year](#), and as a [long-time advocate for tobacco control and cessation](#) and a member of the [National Partnership on Behavioral Health and Tobacco Use](#), the AAFP has developed a number of resources to help family physicians use interventions drawn from behavioral health care to [address tobacco and nicotine dependence](#).

The AAFP offers the following suggestions to help support SAMHSA in its efforts to continue to provide accurate and actionable data on the provision of tobacco cessation services and implementation of tobacco-free policies at mental health and substance abuse treatment facilities.

- That the proposed N-SUMHSS retain and include, at a minimum, the tobacco-related questions from the previous National Mental Health Services Survey (N-MHSS) and National Survey of Substance Abuse Treatment Services (N-SSATS) survey.
- That questions regarding the screening for tobacco use be modified to include screening for use of any tobacco product, including electronic nicotine delivery systems (ENDS).
- That questions regarding implementation of tobacco-free policies at mental health and substance abuse treatment facilities be modified to specify not permitting use of any tobacco product, including ENDS.

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The AAFP also encourages SAMHSA to work with mental health and substance abuse treatment facilities to identify barriers to screening for use of tobacco products and ENDS, including difficulties incorporating ENDS use screening into electronic health records (EHR) systems.

We appreciate the opportunity to provide these comments. Please contact Bellinda Schoof, MHA, CPHQ, CAE, Division Director of Health of the Public and Science at 800-274-2237, ext. 6247 or bschoof@aafp.org or Amy Mullins, MD, CPE, FAAFP, Medical Director for Quality and Science at amullins@aafp.org or 800-274-2237, ext. 6243 with any questions.

Sincerely,



Bellinda K. Schoof, MHA, CPHQ
Director
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Amy Mullins, MD, CPE, FAAFP
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