



September 25, 2020

Jeffrey M. Zirger
Acting Lead, Information Collection Review Office
Centers for Disease Control and Prevention
1600 Clifton Road NE, MS-D74
Atlanta, Georgia 30329

Re: National Youth Tobacco Survey 2021-2023

Dear Mr. Zirger:

The American Lung Association appreciates the opportunity to submit comments regarding the continuation of the Centers for Disease Control and Prevention (CDC)'s National Youth Tobacco Survey (NYTS) for the next three years, 2021 to 2023.

The Lung Association is the oldest, voluntary public health organization in the United States and is committed to eliminating tobacco use and tobacco-related disease. Tobacco use is the leading cause of preventable death and disease in the United State, responsible for the deaths of 480,000 Americans annually. An additional 16 million Americans live with a disease caused by tobacco.

The American Lung Association strongly supports CDC's NYTS and encourages the continued fielding of the survey for the next three years, 2021 to 2023. As noted in the [Federal Register notice](#) for this comment opportunity, at present the NYTS is the most comprehensive source of nationally representative tobacco data among students in grades 9-12 and the only source of such data for students in grades 6-8. NYTS is an invaluable tool for understanding trends in tobacco use among middle and high school students and being able to then act to reduce those rates.

The American Lung Association began using the NYTS data in 1999 in our *Trends in Tobacco Use Report*, a then annual compilation of tables and figures depicting tobacco use and subsequent disease, which is now [available online](#). The information produced by NYTS and other CDC surveys on tobacco use are also used extensively in [Lung Association factsheets](#) on tobacco use available on our public website Lung.org.

The Lung Association also uses data from NYTS in setting strategic and programmatic goals. One of the organization's strategic imperatives is to eliminate tobacco use and tobacco-related lung diseases, and a current mission focal point is to reduce youth e-cigarette use to 15% by 2025. The NYTS is the survey we use to measure progress towards this goal.

The Lung Association also uses data from NYTS in the design and implementation of its health education programs, including our state-of-the-art and recently redesigned Not-On-Tobacco (N-O-T) program. NYTS provides valuable baseline data that help us in our efforts to effectively assess the value of our cessation and prevention programs.

Finally, NYTS data is used extensively in the Lung Association's policy and communication efforts. This includes the Lung Association's annual State of Tobacco Control report, which evaluates states and the federal government on key tobacco control policies. The recent data the survey collects on e-cigarette use among youth has also been especially valuable in understanding trends in youth use of this relatively new tobacco product, and supporting policies intended to reduce the troubling increase in youth use that the survey has documented. NYTS data also has played an integral role in our recently launched [awareness campaign](#) on youth vaping.

In conclusion, the American Lung Association strongly urges CDC to continue conducting the NYTS for the years 2021 to 2023. As demonstrated by the comments above, the survey plays a crucial role in the Lung Association's efforts to prevent and reduce tobacco use among youth.

Sincerely,

A handwritten signature in black ink, reading "Harold Wimmer". The signature is written in a cursive, flowing style.

Harold P. Wimmer
National President and CEO
American Lung Association