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September 7, 2021

Jeffrey M. Zirger

Information Collection Review Office
Centers for Disease Control and Prevention
1600 Clifton Road, N.E., MS-D74
Atlanta, GA 30329

**RE: National Quitline Data Warehouse (OMB Control No. 0920–0856, Exp. Date 10/31/2022)—Revision—National Center for Chronic Disease Prevention and Health Promotion (NCCDPHP), Centers for Disease Control and Prevention (CDC).
Docket No. CDC-2021-0058**

Dear Mr. Zirger:

Truth Initiative® welcomes the opportunity to submit comment regarding the National Quitline Data Warehouse (NQDW). Truth Initiative uses information from the NQDW and believes there is value in collecting data on quitline use.

Truth Initiative is America's largest nonprofit public health organization dedicated to a future where tobacco and nicotine are things of the past. Our mission is clear: achieve a culture where young people reject smoking, vaping and nicotine. We believe each individual has the right to live in a world free from tobacco and nicotine dependence and tobacco-related death and disease. Our proven-effective, nationally recognized truth® public education campaign has prevented millions of young people from becoming smokers, our This is Quitting vaping cessation program has helped over 350,000 young people begin their journey to quit vaping, and our Vaping: Know the Truth school curriculum will be in 2,000 schools by 2022. These programs and others, along with our rigorous scientific research and policy work, are making strides to end the tobacco epidemic.

We recommend revising the NQDW to collect information about services provided by live chat. Therefore, in the Intake Questionnaire, we recommend revising the question about mode of entry to the quitline to:

Mode of entry to the quitline

- ☐ Direct call to the number
☐ Fax referral



- ☐ Email or On-line referral
- ☐ EHR referral/ e-Referral
- ☐ Text message
- ☐ Live chat
- ☐ Other referral modes (specify_____)

We also recommend revising the NQDW Quitline Services Survey to collect information about how services to adolescents (ages 13-17) and young adults (ages 18-24) are handled by the quitlines, particularly around e-cigarettes. Following years of successful tobacco control efforts that achieved record low youth smoking, e-cigarettes have driven total youth tobacco use to rates unseen in decades. Current, or past 30-day, use of e-cigarettes among high school students increased from 11.7 percent to 27.5 percent between 2017 and 2019, driving overall tobacco use among high school students to 31.2 percent.¹⁻³ The most recent data from 2020 show that high school students continue to use e-cigarettes at epidemic levels, with nearly 1 in 5 (19.6 percent) vaping in the past 30 days, and that the intensity of use has increased with 38.9 percent of current users reporting vaping on 20 or more days per month.^{2,3} It is important for the CDC to collect information about state quitline services provided to youth because almost a quarter of adolescents users surveyed in Wave 4 of the PATH survey attempted to quit vaping in the year.⁴ E-cigarettes are now the most commonly used tobacco product among youth and, in the U.S., youth and young adults are more likely than adults to use e-cigarettes. A 2018 Truth Initiative study showed that the highest percentage of JUUL users were ages 18-21 years old.⁵ Breaking out young adults from older adults in your data set would allow for more nuanced understanding of quitline usage and better comparison in academic literature.

Truth Initiative appreciates CDC taking these comments into account as it looks to continue the NQDW information collection for three years. As we stated above, Truth Initiative greatly values data from the NQDW as it is the only survey to collect data about state quitline use. We urge CDC to revise measures to include information about services provided by live chat and how services to adolescents and young adults are handled, particularly around e-cigarettes. Please do not hesitate to contact Maham Akbar, Public Policy Senior Manager at makbar@truthinitiative.org or 202-454-5932, should you need more information or have questions about this submission.

Sincerely,

M. David Dobbins
Chief Operating Officer



References

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3. Wang TW, Gentzke AS, Creamer MR, et al. Tobacco Product Use and Associated Factors Among Middle and High School Students - United States, 2019. *Morbidity and mortality weekly report Surveillance summaries (Washington, DC : 2002)*. 2019;68(12):1-22.
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5. 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.