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October 20, 2023

Jeffrey M. Zirger  
Information Collection Review Office  
Centers for Disease Control and Prevention  
1600 Clifton Road, N.E., MS H21-8  
Atlanta, GA 30329

**Re: National Health Interview Survey (NHIS) (OMB. No. 0920-0214, Exp. 12/31/2023) – Revision – National Center for Health Statistics (NCHS), Centers for Disease Control and Prevention (CDC)**  
**Docket No. CDC–2023–0070**

Dear Mr. Zirger,

Truth Initiative welcomes the opportunity to submit comment regarding the National Health Interview Survey (NHIS).

Truth Initiative is America's largest nonprofit public health organization dedicated to a future where commercial 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 smoking, our This is Quitting vaping cessation program has helped over 640,000 young people begin their journey to quit vaping, and over 845,000 students have engaged with our Vaping: Know the Truth school curriculum. These programs and others, along with our rigorous scientific research and policy work, are making strides to end the tobacco epidemic.

Truth Initiative applauds the goal of the NHIS to collect general statistics on the health of the U.S. population. We greatly value data from the NHIS. Because of its importance, we want to take the opportunity to suggest ways in which the survey can be improved to ensure that we understand tobacco product use among adults.

Truth Initiative urges the CDC to consider the following recommendations regarding the NHIS.



## 1. *Truth Initiative recommends adding questions about oral nicotine pouch use.*

Tobacco companies have indicated in applications submitted to the FDA that oral nicotine pouches are directed at consumers who want alternatives to smoking cigarettes – or even to quit smoking cigarettes- but not necessarily stop nicotine consumption. These products can have high nicotine content, come in many youth-appealing flavors, and their advertisements use language that can imply they are less harmful than traditional tobacco products. Additionally, oral nicotine pouches have grown in popularity in recent years, with overall sales increasing by 541% between 2019 and 2022.<sup>1,2</sup> Therefore, it is important to understand the prevalence of use among adults and identify characteristics of nicotine pouch use and why adults are using these products. We recommend adding the following questions:

Have you ever used a nicotine pouch, EVEN ONE TIME?

*Read if necessary: Nicotine pouches are small, flavored pouches that contain nicotine. Users place them in their mouth. Nicotine pouches are different from other smokeless tobacco products such as snus, dip, or chewing tobacco, because they do not contain any tobacco leaf. Popular brands are Zyn, on!, and Velo.*

- 1. Yes
- 2. No
- DK: Don't Know
- RF: Refused

*If "Yes" to the previous question: Do you NOW use nicotine pouches every day, some days, or not at all?*

- 1. Every day
- 2. Some days
- 3. Not at all
- DK: Don't Know
- RF: Refused

Below are some reasons why people use nicotine pouches. Please indicate your **most important** reason for using nicotine pouches.

I use nicotine pouches because...

- My friends or family have used them
- They are easy to get
- Celebrities or social media influencers use them
- I can use them when or where smoking cigarettes isn't allowed
- They are easy to hide
- They look cool
- They help me fit in socially
- They give me a good buzz
- I think they are less harmful to **me** than smoking cigarettes or other tobacco products





I think they are less harmful to **people around me** than smoking cigarettes or other tobacco products  
They come in flavors I like  
They help me feel relaxed  
They help me feel calm/less anxious  
They help me focus  
They are more socially acceptable than other tobacco products  
I get coupons or store promotions  
Some other reason (please specify):

**2. Truth Initiative recommends asking whether healthcare providers and doctors provided resources to help quit tobacco.**

In the fight against nicotine addiction, doctors and healthcare providers can play a pivotal role in ensuring that people have access to the necessary resources to quit smoking. Research has consistently shown that behavioral interventions are effective in increasing tobacco smoking cessation in adults and that providing training to health care providers on smoking cessation treatment can more than double a smoker's chance of successfully quitting.<sup>3,4</sup> Furthermore, there are also data that shows that people of color are less likely to receive cessation counseling and medication.<sup>5</sup> Asking whether doctors or healthcare providers offer information on cessation services would be pivotal in discerning the efficacy of these inventions and could help determine whether more resources need to be put towards them. Therefore, we recommend adding the following questions:

During any visit to a doctor or healthcare provider in the past 12 months, were you advised to quit smoking cigarettes?

- 1. Yes
- 2. No
- DK: Don't Know
- RF: Refused

[If yes to advice] Did the doctor or healthcare provider provide you with information or resources to help you with quitting?

- 1. Yes
- 2. No
- DK: Don't Know
- RF: Refused

**3. Truth Initiative recommends adding questions about flavored tobacco product use.**

Flavors play a significant role in drawing youth and young adults to tobacco products. Federal law bans flavors in cigarettes — excluding menthol — but not in other tobacco



products, such as smokeless tobacco, cigars, hookah and e-cigarettes. These products come in an array of candy, fruit, dessert and cocktail flavors, such as sour apple, cherry, grape, chocolate, strawberry margarita, appletini, piña colada, cotton candy and cinnamon roll. Flavored tobacco products also typically have bright, colorful packages and are often sold individually and cheaply, making them even more appealing to youth and young adults.<sup>6</sup> It would be helpful to know the prevalence of flavored tobacco products among adults, and such data could be used to identify disparities in flavored tobacco use. This information would be useful for policymakers to make policy determinations regarding flavored tobacco products.

A number of tobacco products are available in “concept,” or vague, flavors. For example, Elf Bars’ BC5000 Rainbow Cloudz, BC5000 Sunset, BC5000 Black Winter, E5000 Energy, and TI7000 Tropical Island are all concept-flavored tobacco products.<sup>7</sup> Research conducted by the Truth Initiative found that these flavors are popular, with almost 58% of current e-cigarette users using concept flavors in the last month.<sup>8</sup> Since adults may not recognize these products as being flavored, it is important to include examples of concept flavors in questions regarding flavored tobacco products.

Thus, we recommend adding the following questions:

Were any of the e-cigarettes or other electronic vaping products that you used in the past 30 days flavored to taste like menthol, mint, clove or spice, alcoholic drinks, candy, fruit, chocolate, or some other flavor besides tobacco (such as “ice”, “purple”, or “island bash”)?

- 1. Yes
- 2. No
- DK: Don’t Know
- RF: Refused

What flavors were the e-cigarettes or other electronic vaping products that you used in the past 30 days? (Select one or more)

- 1. Menthol
- 2. Mint
- 3. Clove or spice
- 4. Fruit
- 5. Chocolate
- 6. Alcoholic drinks (such as wine, margarita, or other cocktails)
- 7. Candy, desserts, or other sweets
- 8. Ice, frost, freeze or chill
- 9. Ambiguous flavors like mellow, purple, or island bash
- 10. Some other flavor not listed here
- DK: Don’t Know
- RF: Refused



Were any of the regular cigars, cigarillos, or little filtered cigars that you used in the past 30 days flavored to taste like menthol, mint, clove or spice, alcoholic drinks, candy, fruit, chocolate, or some other flavor besides tobacco (such as "ice", "purple", or "island bash")?

1. Yes
2. No
- DK: Don't Know
- RF: Refused

What flavors were the regular cigars, cigarillos, or little filtered cigars that you used in the past 30 days? (Select one or more)

1. Menthol
2. Mint
3. Clove or spice
4. Fruit
5. Chocolate
6. Alcoholic drinks (such as wine, margarita, or other cocktails)
7. Candy, desserts, or other sweets
8. Ice, frost, freeze or chill
9. Ambiguous flavors like mellow, purple, or island bash
10. Some other flavor not listed here
- DK: Don't Know
- RF: Refused

Were any of the pipes filled with tobacco – either regular pipes, water pipes, or hookahs- that you smoked in the past 30 days flavored to taste like menthol, mint, clove or spice, alcoholic drinks, candy, fruit, chocolate, or some other flavor besides tobacco (such as "ice", "purple", or "island bash")?

1. Yes
2. No
- DK: Don't Know
- RF: Refused

What flavors were the pipes filled with tobacco – either regular pipes, water pipes, or hookahs- that you smoked in the past 30 days? (Select one or more)

1. Menthol
2. Mint
3. Clove or spice
4. Fruit
5. Chocolate
6. Alcoholic drinks (such as wine, margarita, or other cocktails)
7. Candy, desserts, or other sweets
8. Ice, frost, freeze or chill
9. Ambiguous flavors like mellow, purple, or island bash
10. Some other flavor not listed here





DK: Don't Know  
RF: Refused

Were any of the smokeless tobacco products that you used in the past 30 days flavored to taste like menthol, mint, clove or spice, alcoholic drinks, candy, fruit, chocolate, or some other flavor besides tobacco (such as "frost", "mellow", or "robust")

- 1. Yes
- 2. No
- DK: Don't Know
- RF: Refused

What flavors were the smokeless tobacco products that you used in the past 30 days?  
(Select one or more)

- 1. Menthol
- 2. Mint
- 3. Clove or spice
- 4. Fruit
- 5. Chocolate
- 6. Alcoholic drinks (such as wine, margarita, or other cocktails)
- 7. Candy, desserts, or other sweets
- 8. Ice, frost, freeze or chill
- 9. Ambiguous flavors like mellow, purple, or island bash
- 10. Some other flavor not listed here
- DK: Don't Know
- RF: Refused

4. ***Truth Initiative recommends changing the wording on CIG.0080.00.1 about frequency of e-cigarette use in the past month.***

The survey currently includes a question asking about frequency of cigarette smoking in the past 30 days. We recommend adding this question for e-cigarettes as well. E-cigarette use has increased in recent years, especially among youth and young adults, who use e-cigarettes more than any other age group.<sup>9,10</sup> As prevalence increased, we are also seeing the frequency of use among youth go up, indicating that users are not simply experimenting with e-cigarettes but are instead using them habitually.<sup>11,12</sup> On the other hand, e-cigarette use has remained relatively low and stable among adult users since around 2012.<sup>13,14</sup> Many e-cigarette manufacturers tout their products as quit smoking aids, but while some evidence supports the use of e-cigarettes as quit devices, recent research suggests that their efficacy for quitting is overstated.<sup>15</sup> Therefore, it is important to understand frequency of e-cigarette use among adults. We recommend adding the following question:



On how many of the past 30 DAYS did you use an e-cigarette or other electronic vaping product?

0-30 Days

DK: Don't Know

RF: Refused

**5. Truth Initiative recommends asking about use of heated tobacco products.**

Tobacco companies have begun introducing heated tobacco products or, as the industry calls them, “heat-not-burn” tobacco products. These devices work by heating tobacco instead of burning it. Manufacturers claim this delivery method is substantially less harmful than traditional cigarettes,<sup>16</sup> but current data on health effects of these devices are sparse and most of what has been published has been by tobacco industry scientists. In 2019, the FDA allowed the first type of tobacco heating system to be marketed and sold in the U.S.<sup>17</sup> IQOS, produced by Philip Morris International (PMI), has gained popularity internationally and was sold in test markets by Altria around the country, until sales were forced to stop due to a patent dispute. Data in foreign markets submitted by PMI indicate that dual use of heated tobacco products along with cigarettes is, by far, the most dominant pattern of use, which raises substantial issues about what impact they might have on overall public health.<sup>18</sup> Notably, research has shown that dual use is not associated with reduced cigarette use, but rather increased exposure and poorer health outcomes than using cigarettes or e-cigarettes alone.<sup>19</sup> Thus, we recommend adding the following questions:

Have you ever used a heated tobacco product, even just one time, in your entire life?

*Read if necessary: Heated tobacco products heat tobacco sticks (“heatsticks”) or capsules to produce a vapor. They are different from e-cigarettes, which heat a liquid to produce a vapor. You may know them as heated cigarettes or “heat-not-burn” tobacco products.*

*Common brands are IQOS, glo, and Eclipse.*

1. Yes

2. No

DK: Don't Know

RF: Refused

Do you now use heated tobacco products every day, some days, or not at all?

1. Every day

2. Some days

3. Not at all

DK: Don't Know

RF: Refused

Truth Initiative appreciates the CDC taking these comments into account as it develops the next NHIS. As we stated above, Truth Initiative greatly values data from the NHIS. It is critical that we have the appropriate information about tobacco products in order to best



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determine how to protect the public health from the deadly effects of tobacco, especially as the breadth and variety of tobacco products continues to change. Please do not hesitate to contact Stacey Gagosian, Vice President of Public Policy at [sgagosian@truthinitiative.org](mailto:sgagosian@truthinitiative.org), should you need more information or have questions about this submission.

Sincerely,

Kathy Crosby  
CEO and President





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