

Attachment BB

Comment from the Campaign for Tobacco-Free Kids



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June 23, 2014

Ms. Summer King  
Substance Abuse and Mental Health Services Administration (SAMHSA)  
SAMHSA Reports Clearance Officer, Room 2-1057  
One Choke Cherry Road  
Rockville, MD 20857

RE: Request for Comments to Proposed Project, 2015 National Survey on Drug Use and Health

Dear Ms. King,

The Campaign for Tobacco-Free Kids is please to submit comments on SAMHSA's National Survey on Drug Use and Health (NSDUH). We strongly encourage SAMHSA to continue collecting and disseminating information on tobacco use behavior as part of this important national survey. We support the implementation of the proposed changes to the 2015 NSDUH.

Tobacco use is the leading preventable cause of death in the United States and around the world. In order to inform tobacco control efforts, it is necessary to have access to timely and accurate data that reports tobacco use behaviors across a variety of products and demographic groups. NSDUH provides crucial data that the tobacco control and public health communities rely upon in their daily efforts to reduce tobacco use and monitor progress toward reducing tobacco use rates.

NSDUH data, particularly the initiation data on cigarettes, smokeless tobacco, and cigars, are critical to monitoring tobacco use initiation among youth and young adults and to understanding changes in tobacco use patterns. These data have been central to the development of targeted interventions and campaigns to reduce tobacco use across the nation. Data on smokeless tobacco use is particularly valuable because NSDUH is one of the only national surveys that publish national data on adult smokeless tobacco use.

We are also pleased to see the addition of new demographic questions to assess sexual orientation among adults. Although the available evidence indicates that members of the LGBT community have tobacco use rates that are significantly higher than rates among the general population, data limitations have made it difficult to determine accurate prevalence rates, particularly on a national level. With the addition of these questions to NSDUH and other federally supported health surveys, we will finally be able to determine smoking prevalence among the LGBT population from the same large-scale surveys used to determine smoking rates for other segments of the population.

NSDUH also provides important data on the tobacco brands most often used among population subgroups. At this time, NSDUH is the only survey that collects this information on an annual basis. These data provide the tobacco control community with valuable information about the use of various tobacco products, and how use patterns change over time. For example, it is noteworthy that Grizzly was used by less than one percent of 12 – 17 year olds in 2002; but only five years later, in 2007, it had jumped to the number one brand among this age group. As of 2012, Grizzly remains the

leading brand among 12 – 17 year olds, used by nearly half (48.4%) of youth smokeless tobacco users. This information helps tobacco control practitioners identify connections between the tobacco industry's marketing strategies for specific products and brands to changes in users' brand preferences.

Although not the subject of this notice, as SAMHSA looks to revisions of the NSDUH survey in upcoming years, we recommend expanding the survey to also include newer products, such as electronic cigarettes. While cigarettes remain the most prevalent form of tobacco consumption, there has been in recent years an increase in the number and popularity of new tobacco products. Additional data on initiation and brand preferences for newer tobacco products, like electronic cigarettes, are essential to understanding the changing landscape of tobacco use and to further inform tobacco control efforts and the Food and Drug Administration's (FDA) regulation of tobacco products.

We also encourage SAMHSA to continue publishing tobacco-related special reports, such as "Smoking and Mental Illness" (February 5, 2013), in addition to posting survey results online. NSDUH survey data are valuable only to the extent that they are made accessible to the public. Special reports that summarize findings for tobacco topics are invaluable because they highlight important trends and information that may otherwise go unknown to tobacco control advocates and practitioners.

The current tobacco control environment makes the continuation of NSDUH and the collection of tobacco-related data more important than perhaps ever before. In order to support tobacco policy change, inform FDA regulation, and keep up with the tobacco industry's product innovations, we must have valid and reliable data collected in the rigorous fashion employed by NSDUH.

Thank you for your ongoing work on this important survey.

Best regards,

A handwritten signature in cursive script that reads "Meg Riordan".

Meg Riordan  
Vice President, Research  
Campaign for Tobacco-Free Kids