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September 27, 2018

Summer King
SAMHSA Reports Clearance Officer
5600 Fishers Lane
Room 15E57-B
Rockville, Maryland 20857

**Re: Minority AIDS Initiative – Management Reporting Tools
(MAI-MRTs)
OMB No. 0930-0357**

Dear Ms. King:

Truth Initiative® welcomes the opportunity to submit comment regarding the revision of the Minority AIDS Initiative (MAI) monitoring tools. As the target population for the Capacity Building Initiative (CBI) grantees will be at-risk minority adolescents and young adults, it is important to include tobacco-related questions in the MAI monitoring tools as this population is disproportionately affected by tobacco.

As a result of these overlapping disparities, Truth Initiative makes the following recommendations for the MAI management reporting tools.

Truth Initiative recommends that the questions about tobacco product use be separated into the following categories: cigarettes and other tobacco products.

The proposed adult and youth questionnaires ask about tobacco use to include menthol cigarettes, regular cigarettes, loose tobacco rolled into cigarettes or cigars, pipe tobacco, snuff, chewing tobacco, dipping tobacco, snus, and others. We recommend SAMHSA ask about cigarettes and other tobacco products separately as it does in the current questionnaires when asking about past 30 day use. The proposed questionnaires should ask about tobacco products separately as users and usage patterns appear to vary. According to the 2017 National Youth Tobacco Survey (NYTS), 6.6 percent of White, 3.3 percent of Black, 5.7 percent of Hispanic, 2.0 percent of Asian, 10.3 percent of American Indian/Alaska Native, 9.5 percent of Native Hawaiian/Other Pacific Islander, and 6.6 percent of Multiracial middle and high school students reported current use of cigarettes.¹ Further, Black middle and high school students reported higher current use of cigars (6.7 percent) and hookah (3.5 percent) than cigarettes.¹ Hispanic middle and high school students reported higher current use of hookah (6.2 percent) than cigarettes.¹ Native



Hawaiian/Other Pacific Islander middle and high school students reported higher current use of cigars (11.1 percent) than cigarettes.¹ Thus, it is important to separate questions asking about cigarettes and other tobacco products.

Truth Initiative recommends that brand examples be added for electronic vapor products.

The proposed adult and youth questionnaires state the following: “By electronic vapor products, we mean Vapes, vaporizers, vape pens, hookah pens, electronic cigarettes (e-cigarettes or e-cigs), e-pipes or electronic nicotine delivery systems (ENDS).” The current adult and youth questionnaires states, “The next question asks about ELECTRONIC VAPOR PRODUCTS, such as blu, NJOY, or Starbuzz. Electronic vapor products include e-cigarettes, e-cigars, e-pipes, vape pens, vaping pens, e-hookahs, and hookah pens.” We disagree with the proposed change in the questionnaire. We recommend that SAMHSA use brand examples as the current questionnaires do and update them with more recent products: “By electronic vapor products, we mean Vapes, vaporizers, vape pens, hookah pens, electronic cigarettes (e-cigarettes or e-cigs), e-pipes or electronic nicotine delivery systems (ENDS). Some brand examples include JUUL, NJOY, Blu, Vuse, MarkTen, Logic, Vapin Plus, eGo, and Halo.”

CDC includes these brand examples in the NYTS and we recommend SAMHSA do the same with its MAI monitoring tools. The JUUL electronic vapor product is an illustrative example of why this is important. The new high-nicotine product has become so popular that it captured nearly 73 percent of the e-cigarette market in two years.² A recently published Truth Initiative study found that 25 percent of survey respondents aged 15 to 24 recognized a JUUL e-cigarette device when shown a photo of the product. Among those who recognized JUUL, 25 percent reported that use of this product is called “JUULing,” indicating that this product is so distinctive, it is perceived as its own category.³ Because the landscape of the category of electronic cigarettes is still rapidly changing, it is important that SAMHSA use terms that the grantee population of at-risk minority adolescents and young adults is familiar with in order to have data that best reflects U.S. tobacco product prevalence rates.

Truth Initiative appreciates SAMHSA taking these comments into account as it revises the MAI management reporting tools. If you have questions or need further information, please contact Maham Akbar, Public Policy Manager, at makbar@truthinitiative.org or 202-454-5932.

Sincerely,

M. David Dobbins
Chief Operating Officer



References

1. Odani S, Armour BS, Agaku IT. Racial/Ethnic Disparities in Tobacco Product Use Among Middle and High School Students - United States, 2014-2017. *MMWR Morbidity and mortality weekly report*. 2018;67(34):952-957.
2. Herzog B. Wells Fargo Securities Equity Research. Nielsen: Tobacco All Channel Data Thru 9/8. September 18, 2018.
3. Willett JG, Bennett M, Hair EC, et al. Recognition, use and perceptions of JUUL among youth and young adults. *Tobacco control*. 2018.