



October 10, 2017

Charles J. Rothwell, MBA, MS  
Director  
National Center for Health Statistics  
Centers for Disease Control and Prevention  
U.S. Department of Health and Human Services  
3311 Toledo Road  
Hyattsville, MD 20782

Re: Proposed Redesign of the National Health Interview Survey for 2018

Dear Mr. Rothwell:

The undersigned organizations appreciate the opportunity to submit comments on the National Center for Health Statistics' (NCHS) proposed redesign of the National Health Interview Survey (NHIS) for 2018. Our organizations are deeply troubled by some of the proposed changes to the questionnaire. If implemented, it would leave the public health community and policymakers without the data necessary to inform tobacco prevention and cessation efforts and to put in place effective policies to reduce tobacco use.

As health organizations dedicated to reducing the death and disease caused by tobacco use, our organizations use the data on tobacco product use by adults produced by the NHIS to educate the public about trends in the use of such products in the United States and to monitor progress towards reducing tobacco use. While we appreciate the need to reduce the questionnaire's burden on participants, these data are used to target effective interventions to reduce tobacco use and are also essential to informing policy and research priorities, particularly given the regulatory authority that the Food and Drug Administration (FDA) now has over all tobacco products. Healthy People also uses the NHIS to track its goals.

Our organizations are most concerned about the proposed elimination of questions that measure the use of cigars, cigarillos and little cigars; pipes, including hookah/waterpipes; and smokeless tobacco. While cigarettes remain the most prevalent form of tobacco consumption among adults, understanding whether and to what extent adults use these other forms of tobacco is important for getting a complete picture of tobacco product use among adults in the U.S. Because different types of tobacco products have very different usage patterns and health effects, knowledge of how many people are using each type of tobacco product is essential for examining trends over time, understanding the impact on public health and for planning effective tobacco control measures. Our organizations strongly encourage NCHS to keep the questions about cigar, smokeless tobacco and pipe tobacco in the core annual questionnaire for NHIS. If changes must be made, we urge that these vital questions on tobacco products be added to the rotating core questionnaire for NHIS, where they would be measured for two years in a row with one year off in between.

Our organizations also request that when NHIS reports results on tobacco product use, that the data be broken out by individual tobacco product type rather than as one larger measure (such as

“all non-cigarette combustible tobacco products”). Without detailed data by tobacco product type, it is difficult to understand whether use of certain tobacco products by adults is going up or down over time and to present an accurate picture to the general public and other interested stakeholders.

Recognizing that quitting smoking is one of the best things someone can do to improve their health, our organizations would urge NHIS to keep the measure of quit attempts (*If current smoker: (Past 12 months) Stopped smoking for at least 1 day because trying to quit*) in the annual core questionnaire instead of moving it to the rotating questions. This measure is important in helping understand whether smokers are trying to make a quit attempt – and informs key public health and clinical interventions. While we were pleased that it wasn’t dropped entirely, we urge you to keep this question as part of the core survey.

Finally, our organizations strongly oppose the inclusion of the two questions in the rotating core questionnaire for NHIS that would ask current smokers if they used e-cigarettes to try to quit smoking and whether former smokers used e-cigarettes to successfully quit, as they are currently written. Currently, all e-cigarettes are considered tobacco products under federal law and no electronic nicotine delivery system (ENDS) product has been found by FDA to be safe and effective in helping smokers quit. We are troubled that there was no mention in these questions about the use of evidence-based methods that smokers might use to try to quit.

The U.S. Preventive Services Task Force and U.S. Public Health Service’s 2008 Clinical Practice Guideline Update [Treating Tobacco Use and Dependence](#)<sup>1</sup> recommend FDA-approved prescription and over-the-counter medications and three types of counseling that have proven effective in helping smokers quit. Our organizations believe that NCHS should either include these evidence-based methods for quitting smoking in addition to e-cigarettes in the proposed NHIS questions above about quitting or include a separate question about these evidence-based methods that are asked of both current and former smokers. This would help tobacco control practitioners get a better understanding of what methods among those available that adults are using to quit smoking or the use of other tobacco products.

Our organizations find the NHIS to be incredibly valuable in producing consistent nationwide data about tobacco use among adults that are crucial to implementing successful public health interventions, and we hope NCHS will take our concerns and suggestions about the proposed changes to the NHIS questionnaire for 2018 into consideration. Thank you again for the opportunity to comment on these proposed changes to the National Health Interview Survey questionnaire for 2018. If you have any questions for our organizations, please contact Thomas Carr ([Thomas.Carr@Lung.org](mailto:Thomas.Carr@Lung.org)) at the American Lung Association.

Sincerely,

American Cancer Society Cancer Action Network  
American Heart Association  
American Lung Association  
Campaign for Tobacco-Free Kids  
Truth Initiative

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<sup>1</sup> Fiore MC, Bailey WC, Cohen SJ, et al. Treating Tobacco Use and Dependence. A Clinical Practice Guideline. US Department of Health and Human Services. Public Health Service, 2008. Available at <http://www.ahrq.gov/professionals/clinicians-providers/guidelines-recommendations/tobacco/index.html>.