

April 23, 2020

Jeffrey M. Zirger, Ph.D.  
Lead, Information Collection Review Office  
Office of Scientific Integrity Office of Science  
Centers for Disease Control and Prevention (CDC)  
1600 Clifton Road NE, MS-D74  
Atlanta, Georgia 30329  
Phone: 404-639-7570  
omb@cdc.gov

Re: FR Doc. 2020–07977: Proposed Data Collections Submitted for Public Comment and Recommendations – National Health Interview Survey (NHIS) Revision

Dear Dr. Zirger:

These comments are submitted in response to the April 16, 2020 Federal Register Notice announcing Proposed Data Collections Submitted for Public Comment and Recommendations [FR Doc No. 2020–07977].

## 1 Introduction

**Pinney** Associates appreciates the opportunity to provide comments to the Centers for Disease Control and Prevention regarding the National Health Interview Survey (NHIS) Revision. **Pinney** Associates' scientists and health policy experts provide science- and public health-based strategic solutions to support decision-making by consumer health and pharmaceutical companies. Our consulting firm provides services for a range of companies, including one, JUUL Labs, that market electronic nicotine delivery systems. Some of our principals also are members in a limited liability corporation that owns intellectual property for an as-yet not-commercialized nicotine gum. Although **Pinney** Associates provides advice and guidance to companies with products that are or would be addressed in the NHIS, we are not representing nor speaking on behalf of any client with these comments.

Federal health surveys provide valuable information about the health and health-related behaviors of the U.S. population. These data are useful for a variety of audiences including those that seek to monitor use and misuse of various substances. Our comments on NHIS are focused on questions that assess tobacco product use.

## 2 Recommendations

Our comments are based on our review of the 2020 NHIS questionnaire documents that are publicly accessible and our understanding of planned revisions for the 2021 NHIS questionnaire based on the notice referenced above.

The NHIS survey makes valuable contributions by providing information about population health and behavior. The greatest value can be obtained when questions are

continuously assessed from year-to-year so that patterns can be examined over time. Therefore, we recommend that NHIS items related to cigarette quitting behavior be considered for retention in the 2021 NHIS questionnaire.

## 2.1 Retain Cessation Items

In the Cigarettes and E-cigarettes with Cigarette History section, not all of the crucial measures are included among the annual core items. Smoking cessation items are part of the rotating core and, if we understand the notice correctly, are not planned for retention in 2021. These items are:

- During the past 12 months, have you stopped smoking for more than one day BECAUSE YOU WERE TRYING TO QUIT SMOKING?
- How long has it been since you quit smoking cigarettes?

These items provide important information to public health professionals and tobacco control researchers who are monitoring trends in smoking cessation. For example, our work (Gitchell, Shiffman, and Sembower, 2016<sup>1</sup>) has tracked quit attempts since 2009, with the main results continuing to be updated as new data becomes available<sup>2</sup>. Even more importantly, this item provides the data for the Healthy People 2020 Tobacco Use Objective 4.1.<sup>3</sup>

As smoking cessation is the only proven method to reduce the harms from smoking, particularly in the near term, we urge CDC to continue evaluating cessation behavior as an item in the core survey.

Thank you for the opportunity to provide comments on this instrument. Please contact Mark A. Sembower, MS, Director, Data Management & Statistical Analysis at [msembower@pinneyassociates.com](mailto:msembower@pinneyassociates.com) or 412-687-5677 if you have any questions or need further information.

Sincerely,

Joe Gitchell  
Michael J. Hannon, MA  
John M. Pinney  
Mark A. Sembower, MS  
Saul Shiffman, Ph.D.

---

<sup>1</sup> Gitchell JG, Shiffman S, Sembower MA. Trends in serious quit attempts in the United States, 2009-14. *Addiction*. 2017;112(5):897–900. doi:10.1111/add.13712

<sup>2</sup> <https://pubpeer.com/publications/5516762C0BA75902AABAB11317C881>

<sup>3</sup> <https://www.healthypeople.gov/2020/topics-objectives/topic/tobacco-use/objectives>