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Office of Information and Regulatory Affairs  
Office of Management and Budget  
725 17th Street, NW  
Washington, DC 20503

RE: NEXT Generation Longitudinal Study sponsored by the Eunice Kennedy Shriver National Institute of Child Health and Human Development

The American Legacy Foundation (“Legacy”) is pleased to provide comments about the NEXT Generation Longitudinal Study sponsored by the Eunice Kennedy Shriver National Institute of Child Health and Human Development (NICHD) at the National Institutes of Health (NIH). Legacy applauds the goals of the NEXT Generation Longitudinal Study regarding adolescent health status and health behaviors, and its potential to provide much-needed longitudinal data. This research will inform programs and activities to improve the health of adolescents. We would like to take this opportunity make some suggestions regarding the questions focused on tobacco use in the survey.

As evidenced by its award-winning and successful youth smoking prevention campaign, **truth®**, Legacy knows the importance of determining what influences teen behavior – including choices critical to health. The NEXT Generation study has the potential to help inform public health officials, teachers, behavioral health specialists, and youth-focused organizations, about what sways teens when it comes to their health behaviors. This is especially important with respect to tobacco use: 80% of smokers begin smoking before the age of 18,<sup>i</sup> and everyday about 1500 youth become daily smokers.<sup>ii</sup> The NEXT Generation study provides an opportunity to expand our knowledge base.

It is precisely this opportunity that prompts us to offer suggestions on the survey’s questions on tobacco use. The manner in which tobacco use is asked is important. Ideally, Question 58, the only question that asks about cigarette use of the respondent, should be phrased in such a way that will allow for

direct comparison with other national surveys on tobacco use, such as the National Youth Tobacco Survey (NYTS) or the Youth Risk Behavior Survey (YRBS). Of particular concern is Question 58a, which asks “On how many occasions (if any) have you done the following things in the last 30 days?”. This is similar to a question on the YRBS and NYTS surveys, however while the NEXT Generation Study Survey asks the number of *times* that one has smoked in the last 30 days, the YRBS and NYTS question asks the number of *days* smoked in the last 30 days:

During the past 30 days, on how many days did you smoke cigarettes?

- a. 0 days
- b. 1 or 2 days
- c. 3 to 5 days
- d. 6 to 9 days
- e. 10 to 19 days
- f. 20 to 29 days
- g. All 30 days

Responses from the YRBS and NYTS survey question can be used to establish whether or not a respondent is a *frequent* current smoker (smoking on 20 of the past 30 days) versus a daily current smoker, defined as one who has smoked at least once in the past 30 days. Responses from the analogous question in the NEXT Generation Health Study Survey could not be used for this purpose. We suggest that Question 58a be re-phrased to be more equivalent, and thus more comparable, to other national representative surveys of this age group.

We suggest the addition of three more specific questions on tobacco use, which appear in both YRBS and NYTS, which will allow you to determine prevalence of ever smoking, age of onset, and ever daily smoking:

Have you ever tried cigarette smoking, even one or two puffs?

- a. Yes
- b. No

How old were you when you smoked a whole cigarette for the first time?

- a. I have never smoked a whole cigarette
- b. 8 years old or younger
- c. 9
- d. 10
- e. 11
- f. 12
- g. 13
- h. 14
- i. 15

- j. 16
- k. 17 years old or older

Have you ever smoked cigarettes daily, that is, at least one cigarette every day for 30 days?

- a. Yes
- b. No

Finally, question 50, item “p.” and question 51, item “p.” should be revised to specify what substance is being asked about. “You smoked with her/him in the last 30 days.” As is, the respondent could be indicating either marijuana or cigarette smoking.

We hope that the study developers will take these suggestions into account. We appreciate this opportunity to make these suggestions. If you would like additional information or have any questions, please contact Stephenie Foster, Senior Vice President of Government Affairs at 202-454-5559 or sfoster@americanlegacy.org.

*Legacy is dedicated to building a world where young people reject tobacco and anyone can quit. Located in Washington, D.C., Legacy develops programs that address the health effects of tobacco use, including **truth**®, an award-winning youth smoking prevention campaign, and **EX**®, an innovative tobacco cessation program. Legacy also conducts research exploring the causes, consequences and approaches to reducing tobacco use and operates a nationally-renowned program of outreach to priority populations who disproportionately bear the toll of tobacco. Legacy was created as a result of the 1998 Master Settlement Agreement (MSA) between the states and the tobacco industry. Pursuant to the terms of the MSA, Legacy cannot lobby on specific legislation.*

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i Calculated based on data in Substance Abuse and Mental Health Services Administration (SAMHSA), Results from the 2006 National Survey on Drug Use and Health (NSDUH), 2007. U.S. Department of Health and Human Services, Substance Abuse and Mental Health Services Administration, Office of Applied Studies.

ii Substance Abuse and Mental Health Services Administration. (2005). Results from the 2004 National Survey on Drug Use and Health: National Findings (Office of Applied Studies, NSDUH Series H-28, DHHS Publication No. SMA 05-4062). Rockville, MD.