



August 12, 2025

Jeffrey M. Zirger, PhD  
Information Collection Review Office  
Centers for Disease Control and Prevention  
1600 Clifton Road NE., MS H21-8  
Atlanta, Georgia 30329

RE: National Youth Tobacco Survey Docket No. CDC-2024-0106

Dear Dr. Zirger:

We are writing to express strong support for the continuation of the National Youth Tobacco Survey (NYTS), a national school-based survey of middle and high school students. The NYTS is a long-running, comprehensive source of accurate and reliable information on a number of tobacco-related topics for youth and plays a vital role in addressing the concerning issue of youth tobacco use, including e-cigarette and nicotine pouch use.

Tobacco use remains the number one cause of preventable death in the United States; therefore, the importance of having an annual, school-based national survey that focuses exclusively on tobacco cannot be overstated. The NYTS has been instrumental in providing comprehensive data regarding youth tobacco use, supplying researchers and policy makers with valuable insights on product trends, prevalence rates, knowledge and attitudes about tobacco use, access to tobacco products and risk factors influencing initiation and continued use. Importantly, the NYTS serves as a warning system for new products. For example, the NYTS was the first national survey to document the dramatic growth of youth use of e-cigarettes, highlighting the need for interventions to prevent youth initiation of these then-novel tobacco products. The NYTS was also among the first national surveys to document nicotine pouch use among youth, a product for which the prevalence rate among youth has more than doubled since 2021. Finally, results from the survey enable policymakers, healthcare professionals, educators and other stakeholders to make informed decisions, implement evidence-based tobacco control programs and policies, and evaluate the efficacy of existing programs.

All of these reasons underscore why it is essential that we have data collected in the rigorous fashion employed by NYTS to inform our efforts as we work to reduce tobacco use.

We appreciate the opportunity to respond to the CDC's request for comments and look forward to seeing future NYTS reports. Thank you for your ongoing work on this important survey.

Respectfully submitted,

American Academy of Pediatrics  
American Cancer Society Cancer Action Network  
American Heart Association  
American Lung Association  
Campaign for Tobacco-Free Kids  
Public Health Law Center  
Truth Initiative