STUDENT COMMERCIAL TOBACCO USE IN SCHOOLS

Alternative Measures

School policies regulating the use and possession of commercial tobacco products,[1] including electronic delivery devices and other nicotine products, often contain punitive measures for student violations.

This publication provides sample language and ideas for evidence-based solutions and information as to why non-exclusionary, alternative measures may be more effective than suspension and expulsion at addressing student commercial tobacco product use and nicotine addiction as part of a school's commercial tobacco-free policy.[2]

The tobacco industry has historically targeted, and continues to target, youth to maintain profits, especially in and around schools.[3] Schools should consider these predatory tactics when creating or modifying a policy to address youth possession and use of commercial tobacco in schools.

When considering how to effectively address youth use and possession of commercial tobacco products in schools, it is important to understand how pervasive the industry's targeting of youth and young adults with these highly addictive

products has been for several decades. Overwhelming evidence, including the tobacco industry's own documents, shows that from the 1950s to the present, the tobacco industry intentionally and strategically marketed commercial tobacco products to youth in order to recruit "replacement smokers" to stay in business.[4] In 1981, a Philip Morris representative said, "[t]oday's teenager is tomorrow's potential regular customer."[5] The tobacco industry knows that "the overwhelming majority of smokers first begin to smoke while still in their teens."[6]

Well documented examples of the tobacco industry's unethical efforts to capture the youth market are school "education programs," which were promoted and distributed to schools in the 1980s and 1990s. These programs were ineffective at best and harmful at worst.[7] They were more likely to increase youth commercial tobacco use because they focused on decision-making skills and portrayed smoking as an "adult-only" activity. In so doing, they implicitly labeled commercial tobacco use a "forbidden fruit and badge of maturity," without honestly presenting the addictive and lethal nature of the products.[8]

The tobacco industry continues to target youth in schools. R.J. Reynolds funds a program called "Right Decisions Right Now" that it states is an "evidenced-based educational program designed to prevent young people in grades 5–9 from using tobacco or nicotine products in any form...."[9] And Juul— historically one of the most popular brands of e-cigarettes among youth — previously promoted their own curriculum for schools and offered schools money to implement it.[10] Although Juul later abandoned the program, these examples show that youth are still being targeted, even in schools. Some manufacturers have even offered college scholarships.[11] The U.S. Centers for Disease Control and Prevention warns that, "because the presence of the tobacco industry in school settings may increase the likelihood of youth tobacco product initiation, it is critical that public health and school-based efforts to prevent youth tobacco product use remain independent of tobacco industry influences."[12] **This is especially true given that the U.S. Surgeon General, National Cancer Institute, and a federal court judge all found there is no evidence that tobacco industry-funded prevention programs reduce or prevent commercial tobacco use.**[13]

Youth are also bombarded with tobacco industry advertising and marketing in their day-to-day physical environments outside school. Studies show that exposure to retail advertising and easy in-store access to products is associated with youth commercial tobacco use, with youth who are more frequently exposed to product promotion having 1.6 times higher odds of having tried smoking and approximately 1.3 times higher odds of being susceptible to future smoking, compared to those who are exposed less frequently.[14] There is also research confirming that tobacco retail stores located closer to schools have more tobacco advertising than stores that are located farther away from schools.[15] The tobacco industry spends nearly $24 million

every single day in advertising and 96 percent of that budget goes to marketing in retail stores, where youth frequently enter.[16] Youth are also targeted by price promotions and discounts in the stores, and by an increased number of tobacco retailers in and around schools.[17] This is especially true in low socioeconomic neighborhoods and areas with a high percentage of Black and Indigenous youth and youth of color. The U.S. Surgeon General has concluded that, “there is strong, consistent evidence that advertising and promotion influence the factors that lead directly to tobacco use by adolescents” and this includes both initiation and long-term use.[18]

Additional studies provide specific evidence that e-cigarette marketing exposure is associated with ever and current e-cigarette use among middle and high school students.[19] New e-cigarette products and brands popular among youth continue to flood the marketplace, although the long-term health harms they pose, especially for youth, are still unknown. E-cigarette companies have capitalized on this window of opportunity — before widespread scientific understanding and agreement — to market their products in ways that have contributed to broad use and misperceptions by youth about these products. In 2024, e-cigarettes were the most commonly used commercial tobacco product among middle school

students (at 3.5 percent) and high school students (at 7.8 percent), with the majority (at 87.6 percent) who used flavored e-cigarettes.[20] In addition, nicotine pouch use is increasing rapidly among youth and young adults, nearly quadrupling between January 2023 and August 2025, and more than three in four youth and young adults who use pouches use at least one other commercial tobacco product.[21]

Heavy targeted advertising of youth-appealing flavored cigarettes, cigars, and e-cigarettes is another key contributor to youth commercial tobacco use. Cigarette, cigar, and e-cigarette manufacturers and sellers, including R.J. Reynolds and Juul, make and advertise flavors like menthol, mint, sweet, and fruity flavors — often even labeling their products to mimic well-known candy, cereal, and snack brands.[22] These companies have advertised on social media under the radar of parents, schools, and other concerned adults. Unlike adults who use e-cigarettes, adolescents report the availability of flavors as their top reason for e-cigarette use.[23] In multiple studies, national samples of youth who use e-cigarettes showed that most were not aware the products contain nicotine and believed them to be "not at all addictive."[24]

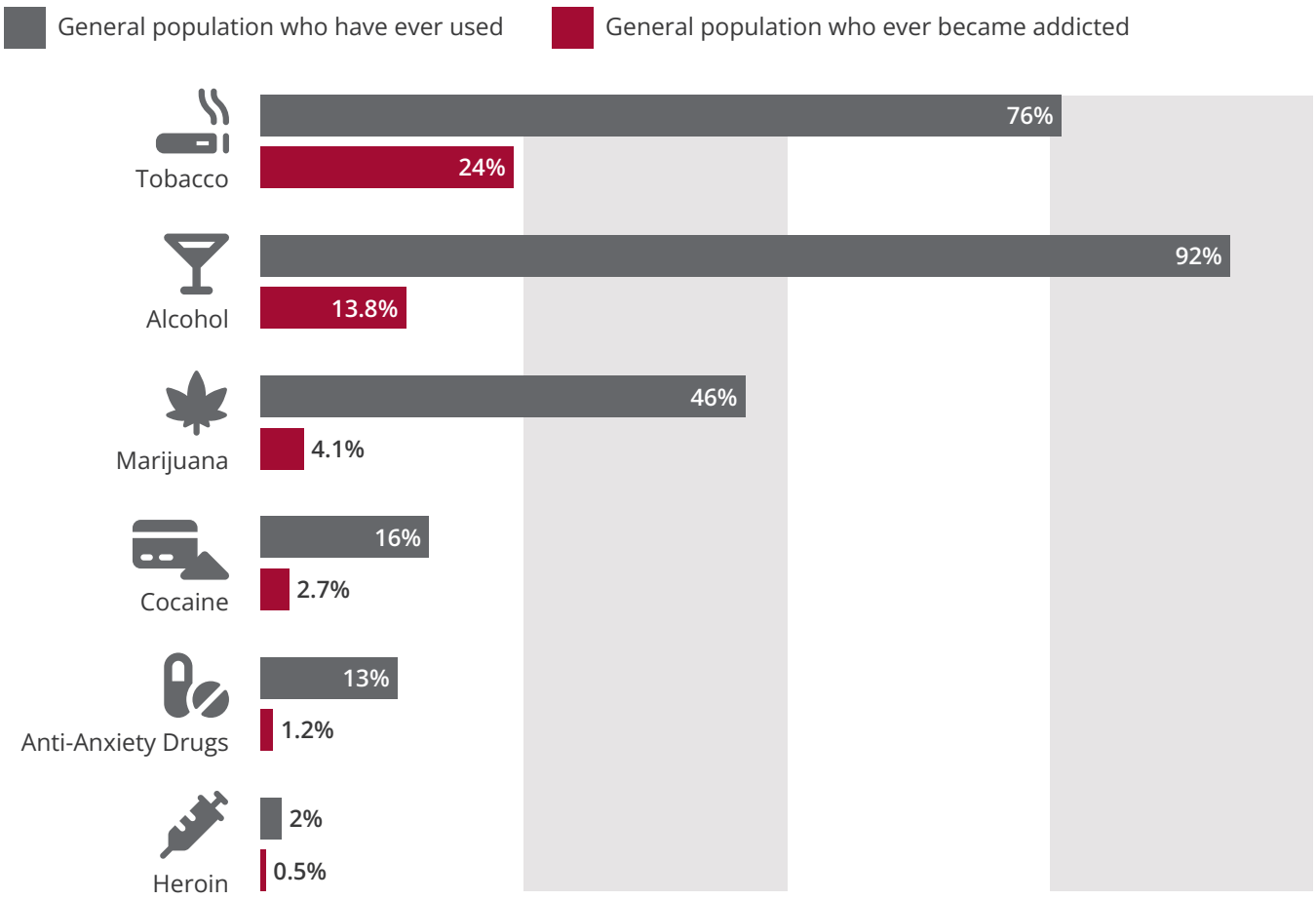
Nicotine exposure in adolescence can permanently change brain development and make nicotine addiction extremely difficult to break.

Exposure to nicotine in adolescence creates measurable changes in brain chemistry and biology. These changes lead to heavier daily use, stronger addiction, and more difficulty quitting tobacco use later in life.[25] Nicotine addiction is complex and differs between adults and adolescents. In fact, the Minnesota Department of Health warns that no amount of nicotine is safe for the adolescent brain.[26]

In general, nicotine addiction functions like other addictions — the nicotine activates dopamine and other positive chemicals in the brain, effectively hijacking the body's natural reward system. A youth's exposure to nicotine can alter brain development resulting in long-term consequences such as decreased cognitive ability, increased mental health issues, and behavioral and personality changes.[27] Additionally, brain changes induced by nicotine exposure can make youth more susceptible to addiction to other substances.[28]

Student use or possession of commercial tobacco products may indicate an addiction to nicotine that should compel school administrators to use supportive and effective methods to assist the student in quitting use of these addictive products. Student use of commercial tobacco in violation of school policies, despite their knowledge of the potential negative consequences of violating the policy, demonstrates the strong addictive nature of nicotine.

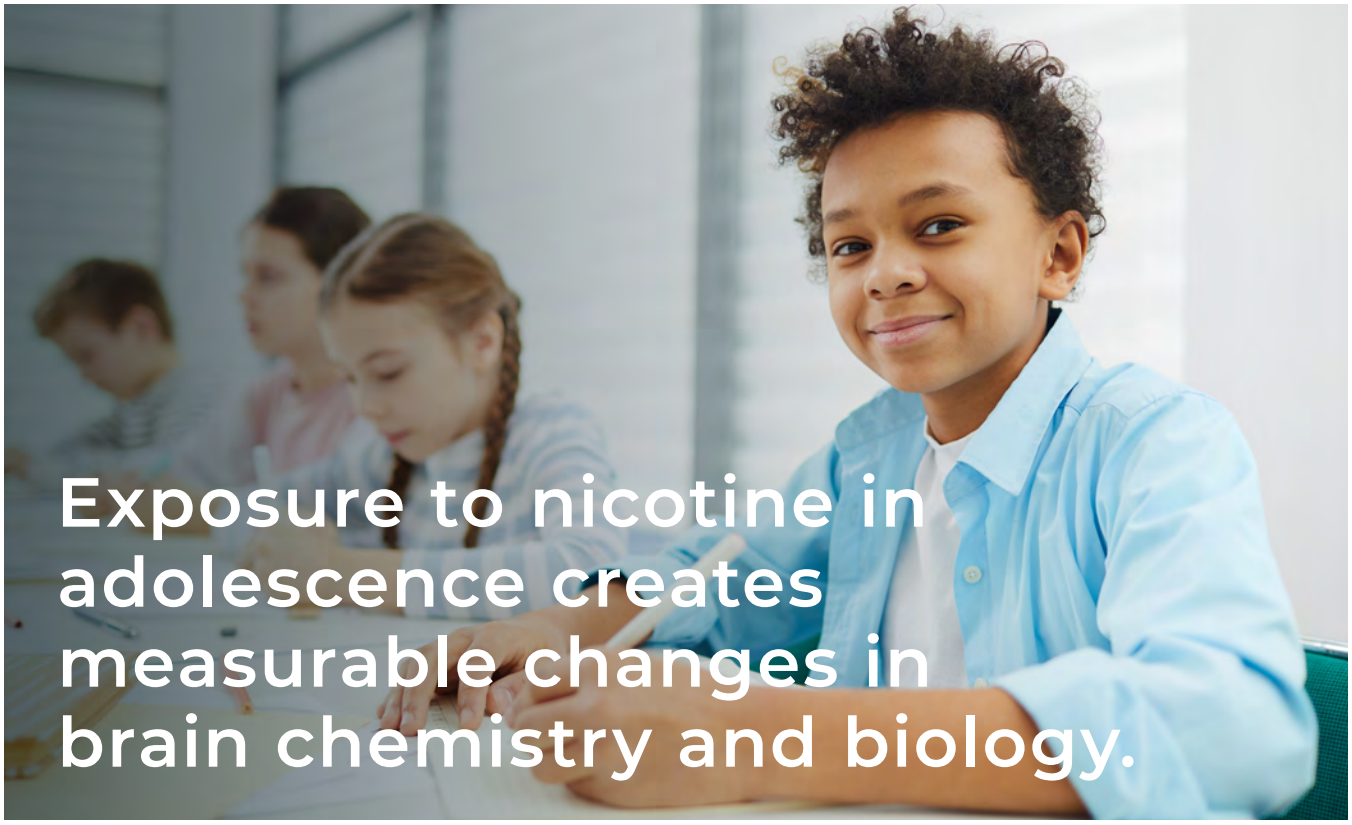
Drugs People Get Hooked On[29]



Effective solutions to school policy violations focus on helping youth succeed.

School years are critical for the physical, social, and educational development needed for success both in school and in life. Research shows penalties like suspension and expulsion contribute to negative educational and life outcomes, undermining schools' goals for supporting healthy student development.[30]

The U.S. Department of Education (DOE) recognizes the connection between exclusionary discipline policies and a variety of serious educational, economic, and social problems.[31] The DOE's guiding principles emphasize fostering safe and inclusive school environments, supporting the social, physical, emotional, and mental health needs of all students, and ensuring the fair administration of student discipline policies, all of which ensure on-time



graduation, decreased drop-out rates, and decreased likelihood of involvement with the criminal justice system.[32] High rates of school suspensions are also associated with lower scores on standardized tests and overall academic achievement.[33] The Minnesota Department of Health endorses the DOE's recommendation that schools should only reserve the use of out-of-school punishments for the most egregious disciplinary infractions that threaten school safety, such as bringing a weapon to school.[34]

Additional addiction treatment research supports a shift towards the decriminalization of addiction in general. In a school setting, suspension, expulsion, and other punitive measures are parallel to and can lead to actual criminalization of addiction in society. While commercial tobacco and nicotine use are not criminalized in the same way as other substances, at its core, nicotine addiction operates in the brain similar to other addictions.[35] Because of that reality, nicotine addiction should be treated in a similar way — by moving away from punitive measures and moving towards therapeutic interventions that address the underlying causes of the behavior (addiction) and helping to treat it. The World Health Organization and the United Nations support this holistic approach, noting that there is "little apparent relationship between the severity of sanctions prescribed for drug use and the prevalence or frequency of use."[36]

Research also demonstrates that the stress, isolation, and separation that occurs when a student is suspended or expelled can increase commercial tobacco and other drug use and prolong addiction. In contrast, an approach that provides a supportive and fulfilling environment can serve to reduce addiction and promote recovery.[37] Focusing on punishment rather than rehabilitation is likely to drive youth into a deeper, more secretive addiction — rather than seeking help from trusted teachers, coaches, or other school staff to achieve recovery.

Tobacco use disparities and implicit bias in the administration of penalties may result in unequal treatment of students that is prohibited by law.

The industry has targeted young women and Black, Indigenous, LGBTQIA+, and low socioeconomic youth with marketing of highly addictive and poisonous tobacco products for decades. This has resulted in use and addiction disparities among youth. For this reason, assessing punitive measures against students for violating the commercial tobacco policy may result in unequal treatment of students based on race, gender, sexual orientation and identity, or socioeconomic status, even if there was no implicit or explicit bias informing the decision-making process.

The process for handling violations of school policies often includes some level of administrative discretion. This discretion can lead to disparities caused by implicit or unconscious biases. A plethora of evidence exists regarding racial disparities in school discipline, including suspension and expulsion practices.[38] Even regarding preschool age children, Black children and children of color experience discipline with greater severity and frequency than their white peers.[39] These disparities are consistent in Minnesota. Minnesota Department of Education student discipline incident data show significant disparities in suspensions and expulsions in schools across the state for Indigenous and Black students, students of color, and students with disabilities.[40] For instance, although African-American students represent 11.7 % of students in the state, they make up 21.5% of students suspended and 18.8% of students expelled without educational services. These concerning disparities only increase when considering a student's multiple identities — male students and students with disabilities that are also Black are suspended and expelled more than any other group.[41]

The DOE Office of Civil Rights has made it clear that schools are responsible for any biased disciplinary actions — whether it is administered by principals, teachers, or school resource officers. The DOE OCR data demonstrates that Black students are significantly more likely to be referred to school resource officers, outside law enforcement, and subject to arrest than their white counterparts. In the 2020–2021 school year, African-American students represented 15% of total K–12 student enrollment but accounted for 18% of law enforcement referrals and 22%

of those were subjected to school-related arrests.[42] School administrators should, therefore, limit the use of school resource officers (SROs) when dealing with students, especially in schools that have increased the presence of SROs in response to the threat of school shootings. In these schools, there has been a corresponding increase in criminalization of student behavior, especially for non-violent crimes.[43] The research recommends that schools ensure that SROs "do not become involved in routine school disciplinary matters" and make certain that the role of SROs is "focused on protecting the physical safety of the school or preventing the criminal conduct of persons other than students."[44]

In conclusion, using punitive measures like suspension and expulsion to penalize student violations of a school commercial tobacco policy is not reasonable, considering the tobacco industry's marketing, the science of addiction, and the long-term consequences associated with expulsion and suspension. Effective school policies attempt to address the underlying addiction to commercial tobacco instead of adopting purely punitive measures, which do not deter continued use and may exacerbate the problem. While schools have an interest in prohibiting behavior that is disruptive and harmful to health, schools may consider weighing the severity of the infraction with the consequences and effectiveness of the punishment. According to the Centers for Disease Control and Prevention, **the most effective approaches to helping youth quit tobacco use are through counseling and education**.[45] As such, schools seeking to avoid excessive

punitive measures in their Commercial Tobacco-Free Policy may consider alternative penalty language for when students are using or possessing these products in violation of the school's policy. As part of a comprehensive K–12 school commercial tobacco-free policy, like PHLC's *Commercial Tobacco-Free K–12 School Model Policy: Minnesota Specific*, the following language may be incorporated to provide supportive and effective interventions for students.

Student violations for possession and use will result in the following measures:

(A) The first violation will result in confiscation of commercial tobacco products, tobacco-related devices, imitation tobacco products, or lighters; notification of parents and/or guardians; and at least one of the following:

  (1) A student meeting and individual student assessment with a chemical health educator or designated staff to discuss commercial tobacco use and the school policy.

  (2) Student participation in a tobacco education program.

  (3) Provision of information to student about available commercial tobacco treatment programs and resources.

(B) The second violation will result in confiscation of commercial tobacco products, tobacco-related devices, imitation tobacco products, or lighters; notification of parents and/or guardians; the provision of information to the student about available commercial tobacco treatment programs; and at least one of the following:

  (1) A student meeting and individual student assessment with a chemical health educator or designated staff with parents and/or guardians to discuss commercial tobacco use and school policy.

  (2) Student participation in a tobacco education program.

(C) The third and any subsequent violation will result in confiscation of commercial tobacco products, tobacco-related devices, imitation tobacco products, or lighters; notification of parents and/or guardians; the provision of information to the student about available commercial tobacco treatment programs; student participation in a tobacco education program; and at least one of the following:

  (1) A student meeting and individual student assessment with a chemical health educator or designated staff with parents and/or guardians to discuss commercial tobacco use and school policy.

  (2) Educational community service.

For more information and resources

- *Commercial Tobacco-Free K–12 School Model Policy: Minnesota Specific* from the Public Health Law Center
- *Youth Purchase, Use, or Possession (PUP): Commercial Tobacco Laws and Penalties* from the Public Health Law Center
- INDEPTH, an education and prevention program for students as an alternative solution to punitive measures, from the American Lung Association
- *Resources for School Nurses: tobacco screening, cessation and prevention* from the Utah Tobacco Prevention & Control Program
- More e-cigarette and vaping resources for schools and parents from the Minnesota Department of Health, including *School Toolkit for E-Cigarette Use Prevention & Cessation*
- Quitting resources for youth and adults:
  - From the Minnesota Department of Health
  - From Truth Initiative
- A Tobacco Prevention Toolkit from Stanford Medicine
- CATCH My Breath: E-cigarette Prevention Program from the CATCH Global Foundation

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Endnotes

1 The Public Health Law Center recognizes that traditional and commercial tobacco are different in the ways they are planted, grown, harvested, and used. Traditional tobacco is and has been used in sacred ways by Indigenous communities and tribes for centuries. In comparison, commercial tobacco is manufactured with chemical additives for recreational use and profit, resulting in disease and death. When the word "tobacco" is used throughout this document, a commercial context is implied and intended unless otherwise indicated. For more information, *see* Mn. Dept. of Health, *Traditional Tobacco and American Indian Communities in Minnesota* (2022), https://www.health.state.mn.us/communities/tobacco/traditional/index.html.

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