

Youth Tobacco Compliance Checks

Alcohol and Drug Abuse Division Minnesota Department of Human Services September 21, 2017

Project Team

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Executive summary

The Minnesota Department of Human Services' Alcohol and Drug Abuse Division (ADAD) has conducted the Congratulate and Educate program since 2014. The program's goals are to implement tobacco merchant education and increase the number of tobacco compliance checks across Minnesota. Congratulate and Educate achieves this through encouraging and supporting community policing by providing resources to local law enforcement and public health agencies to conduct educational tobacco compliance checks and provide tobacco merchant education.

Retailers that pass the compliance check receive a certificate. Rather than issuing a citation to those that fail, participating law enforcement and public health agencies provide retailers education on the consequences of future violations and procedures to help the retailer avoid selling tobacco to minors. The participating agency also provides materials to the establishment's owner or manager, including the inspection date and results and information to educate their employees on best practices to avoid selling tobacco to minors.

Results and findings

In the fourth year of the Congratulate and Educate program, the largest number of agencies participated (59). The average number of checks per agency increased for the third year in a row and was the highest ever. This could have been partly due to an extended timeframe for conducting checks that began in the previous program year. Compliance checks occurred in more counties and participation by agencies in rural and suburban areas increased compared to previous years.

Table 1: Compliance checks by year

Figures	2014	2015	2016	2017	Total
Number of participating agencies	52	49	54	59	91
Number of compliance checks	819	807	1,254	1,448	4,367
Average checks per agency	15.8	16.5	23.2	24.5	48.0
Number (percentage) of checks that resulted in the sale of tobacco	116 (14.2%)	87 (10.8%)	134 (10.7%)	141 (9.7%)	478 (10.9%)

The checks were conducted by participants from local police departments, sheriff's offices, and public health agencies. Police departments comprised over two-thirds of the participants, continuing the trend from the previous program years, but for the first time, they did not conduct a majority of the checks. While participation by public health agencies has been nearly equal over the last three years, the proportion of checks conducted by this group has increased each year: public health agencies conducted 44 percent of the checks in 2017 but made up 17 percent of the participants. The increased checks are partially a result of the participation of public health agencies in Minneapolis and St. Paul, as well as a few rural Minnesota agencies with a presence in multiple communities. The Department of Human Services also collaborated with the Minnesota Department of Health to encourage local Statewide Health Improvement Partnership (SHIP) participants to join Congratulate and Educate.

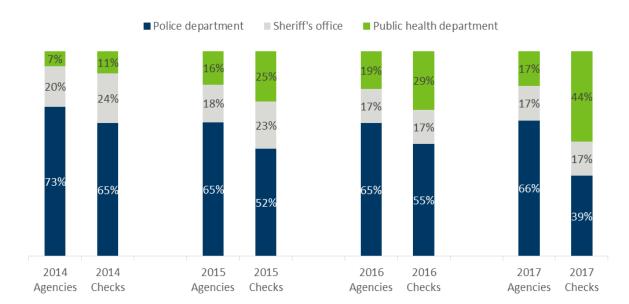


Figure 1: Proportions of participating agencies and checks conducted

The overall number of failed checks increased for the third year in a row, but the percentage of checks that resulted in a failure decreased. The increased participation of suburban agencies appears to have influenced this trend because retailers in suburban areas have consistently had the lowest failure rates. Retailers in rural areas consistently failed checks at a disproportionately higher rate. But that rate and the proportion they make up has been decreasing each year of the program.

Agency feedback

Most of the feedback from agencies was very positive. In particular, agencies said they liked:

- The opportunity to educate retailers without issuing a citation
- Building positive relationships in the community
- The ease of participating
- · Being able to reward retailers

When asked what they disliked or would suggest for future improvements, many agencies simply said "Nothing." Among those that provided constructive feedback, a few suggested raising the dollar amount compensated for the checks and making certificates available electronically so they could be filled out and printed (see the appendix for a full listing of the comments).

All agencies said they would participate again next year.

Highlights of recommendations

Below are highlights of MAD's recommendations for ADAD. The recommendations are intended to help the Congratulate and Educate program increase the number of checks and expand participation to a diverse group of agencies and communities from across Minnesota.

- 1. ADAD should increase participation by continuing to actively recruit public health and law enforcement agencies from counties that have yet to participate.
- 2. ADAD should encourage more participation from public health departments with a presence in multiple communities.
- 3. For law enforcement and public health agencies that have limited staff resources, ADAD should encourage more partnerships with local nonprofit organizations that can perform the checks.
- 4. ADAD should continue to consider the ideal amount of time and the time of year for agencies to conduct checks.
- 5. ADAD should update the information participating agencies collect to include repeat visits to retailers.

Introduction

The Congratulate and Educate program was created by the Minnesota Department of Human Services' Alcohol and Drug Abuse Division (ADAD) in 2014 in response to suggestions from law enforcement agencies to increase merchant education and the number of compliance checks.

Through Congratulate and Educate, police departments, sheriff's offices, and public health departments ("agencies") throughout Minnesota conduct compliance checks on tobacco retailers by having a person under the age of 18 ("minor") attempt to purchase tobacco. These checks differ from other compliance checks because rather than cite those retailers that sell to the minor, they provide education on the importance of keeping tobacco away from youth and the consequences of selling tobacco to minors. The retailers that pass the compliance check receive a certificate congratulating them on their compliance with the law.

This report outlines the results of the 2017 Congratulate and Educate program. Topics include agency participation, number of checks conducted, geographic distribution of agencies, and multi-year results based on retailers that failed checks and differences among agency locations. In addition, the report includes feedback from agencies that participated in the program and recommendations for the future.

About Congratulate and Educate

Each year, the Minnesota Department of Human Services' Alcohol and Drug Abuse Division (ADAD) completes a federal Synar¹ report in compliance with the reporting provisions of the Public Health Service Act² and the Tobacco Regulation for the Substance Abuse Prevention Block Grant.³ As part of this report, ADAD collects data on law enforcement agencies' youth tobacco sales enforcement activities.

Law enforcement agencies indicated their interest in participating in Congratulate and Educate through their responses to the federal fiscal year 2017 Synar Tobacco Enforcement Survey. The Association for Nonsmokers (ANSR) also invited public health agencies to participate.

In 2016, ADAD widened the timeframe to complete checks. Since then, participating agencies have had from January through June to complete them. Participating agencies conducted unannounced educational tobacco compliance checks and were reimbursed \$40 for each. Retailers that passed the inspection received a "Congratulations" certificate. Those that failed were given materials that educated clerks on the law, what compliance checks are, why they are important, and possible penalties for noncompliance. The owners of every retail establishment checked are notified of the result and also receive informational materials.

ADAD was responsible for the overall administration and coordination of the Congratulate and Educate program. This included identifying who received the invitation, managing the contractual aspects of the program

¹ Named after its congressional sponsor, the federal Synar Amendment requires states to have laws prohibiting tobacco sales to persons under 18 and to enforce those law effectively.

² 42 U.S.C. 300x-26.

³ 45 C.F.R. 96.130 (e).

with agencies, creating and sending program materials to participants, and approving and disbursing funds for completed educational compliance checks. ANSR provided technical support by communicating with organizations to obtain information about their organization, confirming their participation in the program, performing on-sight trainings as needed, answering questions, and ensuring they completed the educational compliance checks by the June 30, 2017 deadline. The Minnesota Tobacco Law Center vetted program materials. Management Analysis and Development (MAD) tracked the data and provided analysis.

Program results

ADAD identified 68 agencies as potential participants from 2017 Synar Tobacco Enforcement Survey results and contacting agencies. Of those identified, 59 agencies participated in the initiative and conducted 1,448 educational compliance checks. Public health departments conducted the most of the checks (641). The remaining checks were conducted by police departments (566) and sheriff's offices (241) (see Table 2).

Table 2: Number of compliance checks by agency type

Agency type	Number of agencies	Number of educational compliance checks	Amount reimbursed ⁴
Police department	39	566	\$22,560
Sheriff's office	10	241	\$10,120
Public health department	10	641	\$24,960
Totals	59	1,448	\$57,640

Continuing the trend from previous program years, police departments comprised over two-thirds of the participants. However, police departments did not conduct the most checks for the first time. Each year, the proportion of checks conducted by participating police departments has mostly been decreasing. During the same time, the proportion of checks conducted by public health departments has been increasing even though the number of agencies has remained nearly equal. In 2017, public health departments conducted the most checks (44 percent of the total) while making up 17 percent of the participating agencies. Figure 2 shows how the proportions of agency types and checks have moved over time.

⁴ The total number of educational compliance checks ADAD reimbursement was 1,441 (equaling \$57,640). A few agencies reported performing more educational compliance checks than they were approved for. They did not receive the \$40 reimbursement for those checks.

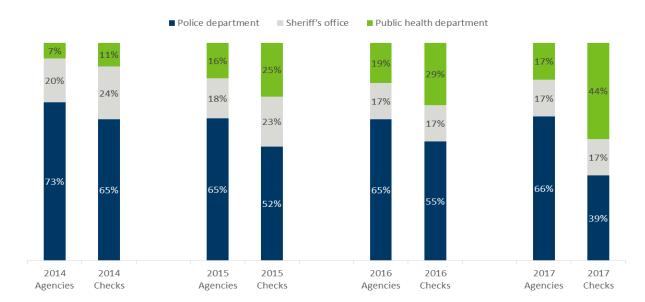


Figure 2: Proportions of participating agencies and checks conducted

Slightly more law enforcement and public health agencies participated than those in previous years (see Table 3). Additionally, the average number of checks per agency increased for the third year in a row, which was also the highest ever. Part of this could be due to the extended timeframe for conducting checks that began the 2016 program year. Of the agencies that participated in 2017, 53 (90 percent) had participated in at least one prior year, and six agencies were new to the program.

Table 3: Number of compliance checks by year

Figures	2014	2015	2016	2017	Total
Number of participating agencies	52	49	54	59	91
Number of compliance checks	819	807	1254	1,448	4,367
Average checks per agency	15.8	16.5	23.2	24.5	48.0
Number (percentage) of checks that resulted in the sale of tobacco	116 (14.2%)	87 (10.8%)	134 (10.7%)	141 (9.7%)	478 (10.9%)

Geographic distribution of checks

Agencies from 47 of 87 Minnesota counties (54 percent) participated in this initiative, an increase from 37 counties in 2016. Over half of the compliance checks (51 percent) were conducted within the 11 county Twin Cities metropolitan area. Participation from agencies in the Twin Cities area was higher compared to 2014 (39 percent), 2015 (34 percent), and 2016 (46 percent). Greater Minnesota counties that completed the largest number of checks included St. Louis (47 or 3.0 percent of all checks), Todd (43 or 3.0 percent of all checks), and

⁵ The 11 county Twin Cities metropolitan area includes the following counties: Anoka, Carver, Chisago, Dakota, Hennepin, Isanti, Ramsey, Scott, Sherburne, Washington, and Wright.

⁶ Greater Minnesota refers to the area outside of the 11-county Twin Cities metropolitan area.

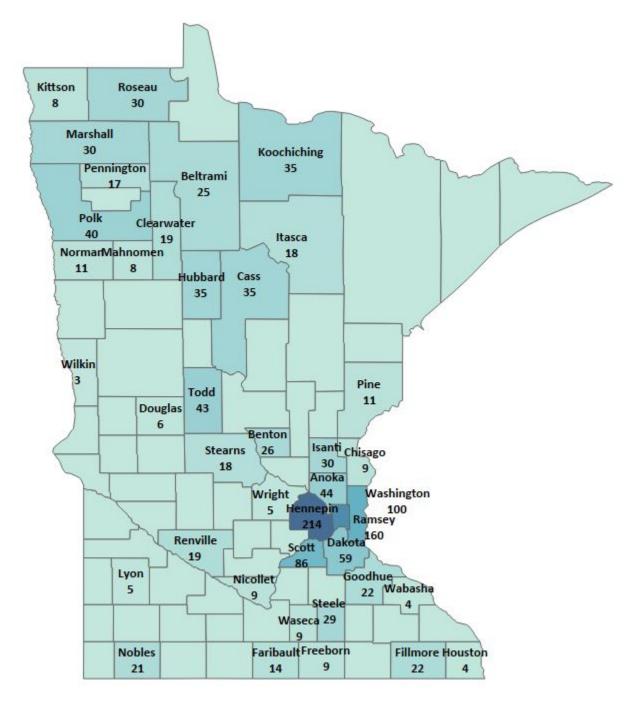
Polk (40 or 2.8 percent of all checks). Table 4 shows the number and percent of educational compliance checks, the number of organizations that conducted the checks, and the amount reimbursed by county. Figure 3 maps the geographic distribution of compliance checks.

Table 4: Number of educational compliance checks completed by county

Ramsey 160 11.0% 4 \$6,28 Washington 100 6.9% 4 \$4,00 Scott 86 5.9% 1 \$3,44 Dakota 59 4.1% 2 \$2,48 St. Louis 47 3.0% 4 \$1,88 Anoka 44 3.0% 1 \$1,77 Todd 43 3.0% 2 \$1,72 Polk 40 2.8% 1 \$1,60 Cass 35 2.4% 1 \$1,40 Hubbard 35 2.4% 1 \$1,40 Koochiching 35 2.4% 1 \$1,40 Koochiching 35 2.4% 1 \$1,40 Otter Tail 33 2.3% 2 \$1,20 Otter Tail 30 2.1% 1 \$1,20 Isanti 30 2.1% 1 \$1,20 Marshall 30 2.1% 1 \$1,20	County	Checks completed	Percentage of all checks	Number of agencies	Amount reimbursed
Washington 100 6.9% 4 \$4,00 Scott 86 5.9% 1 \$3,44 Dakota 59 4.1% 2 \$2,48 St. Louis 47 3.0% 4 \$1,88 Anoka 44 3.0% 1 \$1,76 Todd 43 3.0% 2 \$1,72 Polk 40 2.8% 1 \$1,60 Cass 35 2.4% 1 \$1,40 Hubbard 35 2.4% 1 \$1,40 Koochiching 35 2.4% 1 \$1,40 Otter Tail 33 2.3% 2 \$1,20 Uter Tail 30 2.1% 1 \$1,20 Stele Earth 30 2.1% 1 \$1,20 Isanti 30 2.1% 1 \$1,20 Marshall 30 2.1% 1 \$1,20 Marshall 30 2.2% 1 \$1,20	Hennepin	214	14.8%	6	\$8,560
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Todd	St. Louis	47	3.0%	4	\$1,880
Polk 40 2.8% 1 \$1,60 Cass 35 2.4% 1 \$1,40 Hubbard 35 2.4% 1 \$1,40 Koochiching 35 2.4% 1 \$1,40 Otter Tail 33 2.3% 2 \$1,24 Blue Earth 30 2.1% 1 \$1,20 Isanti 30 2.1% 1 \$1,20 Lake of the Woods 30 2.1% 1 \$1,20 Marshall 30 2.2% 1 \$1,20 Roseau 30 2.1% 1 \$1,20 Steele 29 2.0% 1 \$1,16 Benton 26 1.8% 2 \$96 Beltrami 25 1.7% 1 \$96 Fillmore 22 1.5% 1 \$88 Goodhue 22 1.5% 2 \$88 Nobles 21 1.5% 1 \$84 Clearwater 19 1.3% 1 \$76 Itasca	Anoka	44	3.0%	1	\$1,760
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Goodhue 22 1.5% 2 \$88 Nobles 21 1.5% 1 \$84 Clearwater 19 1.3% 1 \$76 Renville 19 1.3% 1 \$76 Itasca 18 1.2% 1 \$72 Stearns 18 1.2% 1 \$72 Pennington 17 1.2% 1 \$68	Beltrami	25	1.7%	1	\$960
Nobles 21 1.5% 1 \$84 Clearwater 19 1.3% 1 \$76 Renville 19 1.3% 1 \$76 Itasca 18 1.2% 1 \$72 Stearns 18 1.2% 1 \$72 Pennington 17 1.2% 1 \$68	Fillmore	22	1.5%	1	\$880
Clearwater 19 1.3% 1 \$76 Renville 19 1.3% 1 \$76 Itasca 18 1.2% 1 \$72 Stearns 18 1.2% 1 \$72 Pennington 17 1.2% 1 \$68	Goodhue	22	1.5%	2	\$880
Renville 19 1.3% 1 \$76 Itasca 18 1.2% 1 \$72 Stearns 18 1.2% 1 \$72 Pennington 17 1.2% 1 \$68	Nobles	21	1.5%	1	\$840
Itasca 18 1.2% 1 \$72 Stearns 18 1.2% 1 \$72 Pennington 17 1.2% 1 \$68	Clearwater	19	1.3%	1	\$760
Stearns 18 1.2% 1 \$72 Pennington 17 1.2% 1 \$68	Renville	19	1.3%	1	\$760
Pennington 17 1.2% 1 \$68	Itasca	18	1.2%	1	\$720
	Stearns	18	1.2%	1	\$720
Faribault 14 1.0% 1 \$56	Pennington	17	1.2%	1	\$680
	Faribault	14	1.0%	1	\$560

County	Checks completed	Percentage of all checks	Number of agencies	Amount reimbursed
Norman	11	0.8%	1	\$440
Pine	11	0.8%	1	\$440
Chisago	9	0.6%	1	\$360
Freeborn	9	0.6%	1	\$320
Nicollet	9	0.6%	1	\$360
Waseca	9	0.6%	1	\$360
Kittson	8	0.6%	1	\$320
Mahnomen	8	0.6%	1	\$320
Red Lake	8	0.6%	1	\$320
Douglas	6	0.4%	1	\$240
Le Sueur	6	0.4%	1	\$240
Lyon	5	0.3%	1	\$200
Wright	5	0.3%	1	\$160
Houston	4	0.3%	1	\$160
Wabasha	4	0.3%	1	\$160
Wilkin	3	0.2%	1	\$120
Mille Lacs	2	0.1%	1	\$80

Figure 3: Number of educational compliance checks completed by county



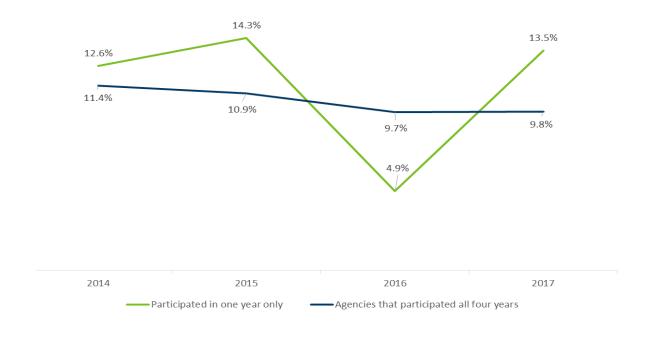
Survey data analysis

There are now four years of Congratulate and Educate data, allowing for more comparisons of program results and year-to-year trends. MAD analyzed the yearly proportions of compliance checks and retailer failure rates⁷ by both geographic areas (rural, suburban, and urban) and agency type (police department, public health department, and sheriff's office).

Multi-year patterns

Twenty-two agencies have conducted compliance checks in each of the four years that Congratulate and Educate has operated. While they may not have checked exactly the same retailers each year, they offer insights into possible trends in pass and failure rates over time. Analysis from previous years' Congratulate and Educate data show the percentage of retailers that sold tobacco to the agencies (i.e., failure rate) was decreasing each year. Incorporating the 2017 program data affirms the overall patterns in failure rates. Figure 4 illustrates a comparison between failure rates reported by the agencies participating in all four years and agencies participating in only one of the four program years.

Figure 4: Comparison of failure rates from checks performed by agencies participating in all four years of Congratulate and Educate to agencies participating in only one year



⁷ Failure rate refers to the number of retailers that sold tobacco to the minor decoy divided by the total number of retailers checked.

Agencies that participated in only one year reported more variation in retailer failure rates in each of the four years. Failures increased about two percentage points from 2014 to 2015, then decreased about 12 percentage points in 2016, and then increased again by a similar amount in 2017. Despite being nearly identical in 2016 and 2017, the failure rates reported by agencies participating in all four years are decreasing overall. This could be due to a number of factors, including:

- Agencies that participate in the program every year may be more assertive about their enforcement of tobacco laws, leading to greater compliance of retailers.
- Agencies that participate every year have had time to develop more effective strategies for engaging and working with retailers that failed compliance checks previously.
- Retailers that have been checked more than once may have learned from initial experiences.

However, because there is no data to show whether the agencies check the same the retailers each year, the differences between the groups may be random.

Geographic patterns

Over two-thirds of the participating agencies in 2017 were located in rural communities, suburban agencies made up 31 percent, and agencies from urban areas were the smallest group. Figure 5 illustrates the difference in composition of checks conducted in the geographic regions.⁸

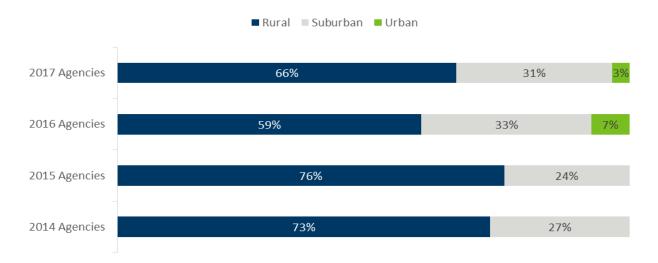


Figure 5: Percentage of checks conducted by agency locations

Figure 6 shows the change in failure rates by region. While the total number of failed checks increased for the third year in a row, the overall percentage of checks that resulted in a failure decreased. The increased participation of suburban agencies appears to have influenced this trend because retailers in suburban areas have consistently had the lowest failure rates. Failure rates have consistently been higher in rural areas. The

⁸ Because it is impossible to determine whether this data reflects results from checking the same or similar retailers over the years, readers should be cautious in interpreting these results.

failure rate for urban agencies was the highest of the three groups in 2017 (and nearly doubled from the previous year). However, because there were only two participating urban agencies and only two sets of data points, however, caution should be used in interpreting urban area trends.

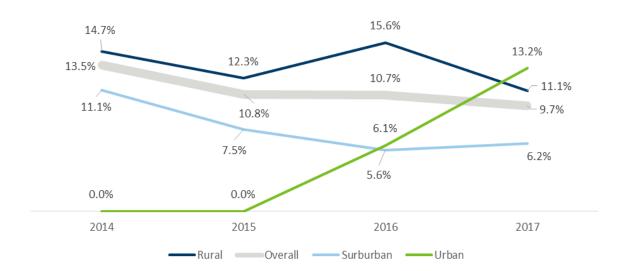


Figure 6: Failure rates for agencies by geographic region

While rural agencies made up two-thirds of participants, they performed 50 percent of the compliance checks. Additionally, they have a disproportionately higher percentage of failed checks (57 percent). The disproportionately high percent of failures for rural retailers has been observed all four program years (though their proportion of failures overall decreased each year). Conversely, agencies in suburban areas perform a disproportionately higher number of checks and have a disproportionately lower number of retailers who failed.

Patterns by agency type

As described earlier in the report, participation by public health departments has been nearly equal over the last three years, but the proportion of checks conducted by this group has increased each year. Public health departments conducted 44 percent of the checks in 2017 but made up 17 percent of the participants. Public health departments have also made up a larger proportion of the checks over time in both rural and suburban/urban areas while the number of departments has mostly remained the same.

In 2014, police departments performed the majority (58 percent) of checks in Greater Minnesota. That proportion has become smaller each year, and in 2017, it was 37 percent. Because there were nearly four times as many police departments conducting checks in Greater Minnesota in 2017 that proportion stands out even more.

In the Twin Cities metropolitan area, police departments performed a similar proportion of checks (42 percent) compared to the public health departments (43 percent). This is in contrast to the three prior program years where the average number of checks by police departments was 73 percent. Checks by public health

departments were also disproportionately higher in the metropolitan area when compared to the number of participants.

Agency feedback

Participants submitted paperwork to ADAD that included documentation of the number of inspections completed and an exit survey that requested feedback on the program. The exit survey included questions about what agencies liked and disliked about the program and whether they had suggestions for improvement.

All agencies said they would participate again next year.

What agencies liked about Congratulate and Educate

Agencies cited a number of things they liked about Congratulate and Educate. Over one-third of agencies said they appreciate the opportunity to educate retailers about tobacco laws. Several also commented that they liked the non-punitive aspect of Congratulate and Educate checks, that it is a helpful way to improve relationships in the community, and that it is easy to participate. A few other agencies found the forms helpful and liked being able to reward retailers that passed the checks.

Below are some illustrative comments from the agencies on what they liked about Congratulate and Educate:9

- It was nice to be able to educate clerks and give them warnings instead of citations. Also, great to see when they pass and how good they feel to pass.
- It's good to connect with vendors in person, and let them know we're monitoring tobacco sales. It give
 those who fail the educational checks a significant reminder to take underage tobacco sales seriously
 before they are given a penalty.
- The information and certificates that I was able to provide for the business.
- Excellent way to build trust with the merchants. Several learned their lesson last year!
- It provides an opportunity to educate the business if they fail without attaching the citation to it. It's great, positive community building activity.
- The material provided for the project was clear and rich in information. Most businesses appreciated the
 context and how it ties nicely with our agency work on tobacco. Reward the stores for being successful.
 Easy forms.
- Get youth involved in their community in a positive way and a chance to earn money.
- All the businesses thanked us and were very pleased with how they were conducted.

⁹ Items in italics are actual responses to exit survey questions. MAD did not edit responses but made spelling and grammatical corrections if the original version distracted from the meaning of the response. A full list of all responses can be found in the appendix.

What agencies suggested for improvement

When asked what they disliked or what could be improved, over three-quarters of the agencies either made no comment or replied, "Nothing" or "N/A." Of the agencies that did provide suggestions, a few said they would like the paperwork and forms to be available electronically, that the compensation amount for performing checks should be increased, and that the June deadline can make it difficult to find minors to conduct the checks. In total, these comments represented feedback from four agencies.

Below are the suggestions that were provided.

- The June 30th deadline is doable, but it would be nice to have more time since the youth we work with typically can't do much with us until summer vacation.
- Raising the price of the checks would be nice.
- Nothing other than higher compensation.
- Would like the certificates to be emailed so they could be filled in and printed off for a more professional look.

Recommendations

MAD's recommendations for ADAD are intended to help the Congratulate and Educate program increase the number of checks and expand participation to a diverse group of agencies and communities from across Minnesota. These modifications will also allow for further analysis of failure rates.

Encourage more local partnerships

ADAD has used the widely administered Synar survey to recruit law enforcement agencies and has also actively recruited public health departments with the help of ANSR. As a result, the number of compliance checks (1,448), the number of participating agencies (59), and the number of counties where checks occurred (47) all increased compared to the previous years. ADAD should continue these efforts. However, the overall number of participating agencies has increased only slightly since 2014, while the number of checks has increased by over 75 percent. Additionally, there were 40 counties where no checks occurred at all.

To help the program expand into more communities, ADAD should encourage participation among public health departments with a presence in multiple communities (this occurred in two areas of the state in 2017). ADAD should also encourage more partnerships between law enforcement agencies, public health departments, and local nonprofit organizations. Some agencies that do not have the staff resources to complete tobacco sales compliance checks will contract with nonprofits. The Congratulate and Educate program, however, is set up to just work with law enforcement and public health agencies. By allowing for more partnerships, more retailers and communities could be included.

Modify the program timeline

In 2016, the Congratulate and Educate timeline was modified to allow more agencies to complete their checks and return paperwork to ADAD. This increased agencies' ability to conduct more compliance checks. However, as one agency mentioned, it is difficult to conduct checks during the school year due to the availability of the minor (see the appendix). Because Congratulate and Educate funding is aligned with the state fiscal year, all funds must be spent by June 30. MAD recommends ADAD explore opportunities to continue the program across fiscal years to accommodate summer breaks for minors.

Track repeat visits to retailers

Four years of program data have allowed more analysis of checks and failure rates in rural, suburban, and urban areas. Rural agencies have continued to report a disproportionately higher frequency of failures compared to the suburban and urban agencies. However, it is still too soon to tell what is causing the differences in failure rates. Without data to tell whether agencies checked the same retailers each year, analysis will be inconclusive. MAD recommends ADAD update the Congratulate and Educate requirements to have participating agencies track repeat visits to retailers. Ongoing analysis of that data would determine whether the trend in disproportionate failure rates is constant over time. Additional information such as targeted interviews that ask rural, suburban, and urban retailers and clerks about their perceptions of tobacco laws would provide ADAD with a fuller understanding of these and other trends and why they might exist.

Conclusion

The 2017 Congratulate and Educate program saw a slight increase in the number of participating agencies but had the largest number of checks conducted in the four program years. Checks were also conducted in more counties compared to previous years. While there was a decrease in the number checks performed by law enforcement agencies, the number of checks performed by public health departments increased significantly.

Analysis of data from all four years found that the overall failure rate of retailers has been slowly declining. The failure rate of retailers checked by agencies that have participated in Congratulate and Educate every year appears to be lower overall and follow a more predictable pattern. However, the failure rate continues to be disproportionately higher for retailers in rural areas and disproportionately lower for retailers in suburban areas. ADAD would need additional information to determine the causes and effects of varied failure rates among locations.

Opportunities to improve program design include increasing the number of agencies that participate, increasing the number of areas of the state represented, and finding an ideal timeline that maximizes agency participation.

Appendix: Responses to open-ended questions

What did you like about the Congratulate and Educate Project?

- It was nice to be able to educate clerks and give them warnings instead of citations. Also, great to see when they pass and how good they feel to pass.
- It makes the vendors aware that checks are being done and they are held responsible
- Good program that seems to work as far as bettering the relationship between law enforcement and sellers.
- The information and certificates that I was able to provide for the business.
- The ease of the process and allowing for education to area businesses
- Info is good.
- It's good to connect with vendors in person, and let them know we're monitoring tobacco sales. It give those who fail the educational checks a significant reminder to take underage tobacco sales seriously before they are given a penalty.
- The awareness it brought to retailers.
- We like that we are reimbursed for each check and the officers enjoy educating the violator versus issuing a citation which would likely end in the violator being terminated.
- It educates the business/owner/management/employees.
- handouts are clear and will help educate
- Excellent way to build trust with the merchants. Several learned their lesson last year!
- Providing information to vendors to further educate employees.
- The free pass for education prior to the mandated checks
- We enjoy the opportunity to interact with and educate store staff, managers, and owners about the laws
 pertaining to the sale of tobacco and tobacco products to minors.
- Taking the pressure off buyer/clerk if there is a mistake. Opportunity to educate
- It provides an opportunity to educate the business if they fail without attaching the citation to it. It's great, positive community building activity.
- The ability to conduct the checks of the establishment without having file criminal charges & educate the clerk that sold the product without any repercussions.
- forms, easy to find students, working with the vendor/agency
- That it gives employees at the businesses a chance to see how serious that selling tobacco is without getting into trouble.
- easy-no criminal prosecution/owners appreciate warning
- No sanctions and a positive contact in both cases.
- Good chance for enforcement without criminal consequences

- Reward the stores for being successful. Easy forms
- Chance to speak with vendors. Liked the hand out for fails
- Nice to help educate each establishment and congratulate them on their success.
- I like the positive reinforcement of giving certificates and emphasis on education for a common goal instead of strict enforcement
- Get youth involved in their community in a positive way and a chance to earn money.
- The certificates of appreciation.
- The material provided for the project was clear and rich in information. Most businesses appreciated the context and how it ties nicely with our agency work on tobacco.
- I like that we are congratulating an employee for enforcing the law
- forms, easy to find students, working with the vendor/agency
- It was nice to give them a nice print out of information and be able to explain the dangers.
- It gave us an opportunity to educate retailers as well as develop relationships between the Department,
 MAPP, and businesses
- Easy-everything included
- Helps to educate our license holders helps w/ not getting tobacco to the hands of minors
- I like how much information was on the failed compliance check paperwork.
- All the businesses thanked us and were very pleased with how they were conducted.
- Allowed us to educate vendors.
- This is an excellent way to work with and educate our vendors. Easy to participate and complete required forms
- The opportunity to talk face to face with the Retailors and help educate them.
- Positive contact with business
- We don't have to charge anymore
- Or community really appreciates this program. Very positive response this year.
- Educating retailers who appreciate this aspect. By doing so, retailers remain vigilant.
- Great opportunity for face-to-face staff engagement of tobacco retailers. Great way to foster relationships and emphasize the City's commitment to ensuring public health and safety.
- It allows the cashier to learn from this mistake without getting a citation.
- Gives vendors a warning before I do state required checks.
- Clerks realize how close they were to getting a fine
- We are able to have something to give to the employee who is doing a good job and the business owners appreciate the program
- Good educational info for a business. Good that we give longer time frame to complete
- more educational to businesses
- Fun and educational
- I liked that it was an outreach to the community businesses. It provides a way to make a positive impact
- didn't have to write citations -good amount of time to complete warning reminders given to let them know we are keeping tabs on them.

What did you dislike about the Congratulate and Educate Project/suggestions for improvement?

- Nothing the program is set up well and worked well
- nothing
- Nothing
- n/a
- The June 30th deadline is doable, but it would be nice to have more time since the youth we work with typically can't do much with us until summer vacation.
- Nothing
- Nothing, it is a very straight forward and easy to understand initiative.
- n/a
- NA
- -
- n/a
- X
- No complaints about the program!
- There isn't anything I dislike about doing the educational checks. Raising the price of the checks would be nice
- Nothing, seems to work fine.
- Nothing other than higher compensation
- No improvements
- Nothing
- Would like the certificates to be emailed so they could be filled in and printed off for a more professional look.
- Nothing
- It went well, but it gave some youth the idea that they could actually buy tobacco.
- None
- I like it all
- Nothing. It is nice to be able to educate without the legal sanctions only so they can be appreciative of the break but really work to retain employees.
- Word travels fast in small towns. Some retailers, who have been fined in the past, were upset that the business that failed was not fined.
- nothing
- I did not like giving out the certificate to the person working. I don't think the people that received them appreciate it.
- NA
- Cannot think of any improvements
- Nothing
- Works well.

- (na)
- n/a
- The program is fine as is. It adequately serves the intended purpose through positive reinforcement and it puts offenders on notice that authorities are proactively taking appropriate enforcement action.
- Nothing, it is a good program and is received very well in our area.
- No issues.
- •
- n/a
- Prizes or copays for the decoys (t-shirt?)
- I did not like that warnings were issued. Although education is the point of the program this is their jobs. Employees should not need a warning to check IDs
- none