New Reviewer Training
Day 2

Retail Review Procedures

Day 2 – Training Overview

- Cooperative Agreement
- Retail Review Assignments
- Non-Compliance Codes
- 3-Step Retail Review Process

Cooperative Agreement

- Cooperative Agreement = Contract
- USDA has cooperative agreements with state agencies to gather COOL compliance data
- Established in April 2011
- Amended in February 2014
- Expire in April 2016
Cooperative Agreement

USDA will:
- Supervise enforcement activities
- Provide regulatory and retail review training
- Reimburse travel expenses for state employees to attend required training
- Specify the locations to conduct retail reviews
- Reimburse the state agency for each retail review completed, contingent upon submission of properly completed documentation
- Reserve the right to make further investigations within the state

The State Agency will:
- Designate a COOL Program Manager to:
  - Serve as the primary point of contact
  - Maintain and delegate retail review assignments
  - Ensure state reviewers are properly trained
  - Circulate COOL program updates to reviewers
  - Be responsible for the reviewer's activities
- Submit timely reimbursement requests
- Ensure that reviews are promptly submitted to USDA within 14 calendar days.

Retail Review Assignment
- Retail store locations are determined by the USDA-COOL Division
- Retail store assignments are distributed to each State Manager
- In 2015, state reviewers will primarily conduct follow-up reviews (FURs)
**Retail Review Assignment History**

<table>
<thead>
<tr>
<th>Year</th>
<th>Initial Retail Reviews</th>
<th>Follow Up Retail Reviews</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>5,000</td>
<td>0</td>
</tr>
<tr>
<td>2010</td>
<td>7,741</td>
<td>622</td>
</tr>
<tr>
<td>2011</td>
<td>4,005</td>
<td>1,190</td>
</tr>
<tr>
<td>2012</td>
<td>3,836</td>
<td>546</td>
</tr>
<tr>
<td>2013</td>
<td>2,061</td>
<td>547</td>
</tr>
<tr>
<td>2014</td>
<td>3,028</td>
<td>563</td>
</tr>
<tr>
<td>2015</td>
<td>--</td>
<td>2,372</td>
</tr>
<tr>
<td>Total</td>
<td>25,671</td>
<td>5,840</td>
</tr>
</tbody>
</table>

**2014 Retail Review Assignments**

Overall 2014 COOL Compliance by Rating

- **No Findings:** 34.1%
- **Adequate:** NC < 5% or NC as percent of commodity count < 5%: 34.5%
- **Compliance Deficiency:** NC < 5% or NC as percent of commodity count ≥ 5%: 18.1%
- **Critical Weakness:** NC ≥ 5% or NC as percent of commodity count ≥ 5%: 12.8%

**Non Compliance Code (NC)**

1-9
NC Codes

- COOL Reviewers will document non-complying items and their NC code(s) as appropriate.
- Findings of non-compliance are considered unofficial until evaluated by USDA.

NC Codes 1-9

<table>
<thead>
<tr>
<th>Code</th>
<th>Non-Compliance Findings for Initial Retail Reviews</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>The covered commodity is not identified with the country of origin.</td>
</tr>
<tr>
<td>2</td>
<td>The country of origin declaration is not legible and/or is not placed in a conspicuous location.</td>
</tr>
<tr>
<td>3</td>
<td>The country of origin declaration is not accurate at the point of sale.</td>
</tr>
<tr>
<td>4a</td>
<td>The country of origin is not stated in an acceptable form. The use of &quot;or&quot; and &quot;and/or&quot; and &quot;may contain&quot; is not acceptable.</td>
</tr>
<tr>
<td>4b</td>
<td>The country of origin is not stated in an acceptable form. The regional designation or the term, &quot;locally grown&quot; does not provide sufficient origin declaration.</td>
</tr>
<tr>
<td>4c</td>
<td>Production steps for meat muscle cuts are not present or stated in an acceptable form.</td>
</tr>
<tr>
<td>5</td>
<td>Abbreviations and variant spellings do not unmistakably indicate the country of origin.</td>
</tr>
<tr>
<td>6</td>
<td>The covered commodity is not identified with the method of production.</td>
</tr>
<tr>
<td>7</td>
<td>The method of production declaration is not legible or is not placed in a conspicuous location.</td>
</tr>
<tr>
<td>8</td>
<td>The method of production declaration is not accurate at the point of sale.</td>
</tr>
<tr>
<td>9</td>
<td>The method of production is not stated in an acceptable form.</td>
</tr>
</tbody>
</table>

NC Codes 10-16

<table>
<thead>
<tr>
<th>Code</th>
<th>Non-Compliance Findings for Initial Retail Reviews</th>
</tr>
</thead>
<tbody>
<tr>
<td>10</td>
<td>Records were not provided within 5 business days.</td>
</tr>
<tr>
<td>11</td>
<td>Records do not provide the country of origin information.</td>
</tr>
<tr>
<td>12</td>
<td>Records do not provide the method of production information.</td>
</tr>
<tr>
<td>13</td>
<td>Records do not provide the Supplier information. (Supplier records are required for all Traceback items)</td>
</tr>
<tr>
<td>14</td>
<td>Records information for country of origin as provided by supplier is not accurately conveyed to point of sale label.</td>
</tr>
<tr>
<td>15</td>
<td>Records information for method of production as provided by supplier is not accurately conveyed to point of sale label.</td>
</tr>
<tr>
<td>16</td>
<td>Records that identify the chain of custody for the pre-labeled item were not provided within 5 business days.</td>
</tr>
</tbody>
</table>
NC Codes

- Initial reviews are eligible for NC code 1-9 only.
- Follow-up reviews are eligible for NC code 1-16.
- 2015 reviews will include follow-up reviews only.

NC Code 1 – No Country of Origin

- The retailer did not convey country of origin information to consumers in any manner.

<table>
<thead>
<tr>
<th>Code</th>
<th>Non-Compliance Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Covered commodity is not identified with the country of origin.</td>
</tr>
</tbody>
</table>

NC Code 1 – No Country of Origin

- Some retailers use box to display covered commodities and country of origin. This is acceptable as long as the consumer can easily read and understand the information.
- No country of origin means no origin is visible on the individual package, PLU stickers, store sign, store label, rubber band, etc.
NC Code 1 –
Grade Standards
➢ Grade standards do not indicate COOL.
➢ Grade designations only indicate the product meets the criteria established by the standard.

NC Code 1 –
Inspection/Organic
➢ “US Gov’t Inspected” and the USDA Organic Seal do not indicate COOL.
   • Domestic and imported items are inspected by US Government for wholesomeness and may earn USDA Organic seal.

NC Code 1 – Supplier’s Address
➢ A supplier’s address does not indicate COOL.
➢ The packer’s or distributor’s address refers to the company, not the product’s origin.
NC Code 2 – Not Legible and/or Conspicuous

- Country of origin is present however it is covered, smeared, obstructed, etc.

<table>
<thead>
<tr>
<th>Code</th>
<th>Non-conspicuous Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>The country of origin declaration is not legible and/or is not placed in a conspicuous location.</td>
</tr>
</tbody>
</table>

NC Code 2 - Inconspicuous

- **Example:** Below the retail store advertisement sign is covering country of origin claim.

NC Code 2 - Inconspicuous

- **Example:** The Organic tape is covering the PLU sticker that contains the country of origin information.
NC Code 2 – Less than 50%

In the case where less than 50% of the items in a bulk bin have a country of origin, NC code 2 will apply.

Example: Below, 1 of the 6 Green Onion bunches has a tag stating “Produce of Mexico.” The other bunches do not have COOL. Therefore, NC2 is recorded for Green Onions. Do not count each individual item; estimates are sufficient.

NC Code 2 – Additional Examples

Smeared printing making the country of origin illegible.

The origin sign is located far away from the item it is referencing or too small to see.
NC Code 2 – Additional Examples

- NC code 2 applies when checkboxes list the possible country(ies) of origin; however, none of the checkboxes are selected.

NC Code 3 – Not Accurate

- NC 3 is appropriate when contradictory origin labels are visible to the consumer.

<table>
<thead>
<tr>
<th>Code</th>
<th>Non-Compliance Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>The country of origin declaration is not accurate at point of sale.</td>
</tr>
</tbody>
</table>

NC Code 3 – Inaccurate

- Examples of NC code 3 include:
  - Product Tag vs. Store Label – tag states USA but store label states Mexico
  - Product Label vs. Store Banner – label states Peru however store banner states Canada
  - Package Label vs. Store Label – pre-labeled package states Product of Australia however store label states born, raised, harvested USA
NC Code 3 – Inaccurate

**Example:** The kale has a product tag stating “Product of USA.” The store sign on the shelf states “Product of Mexico.” The product tag and shelf sign contradict; therefore, this is NC code 3.

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NC Code 3 – Inaccurate

**Example**

![Image of kale with product tags](image1)

NC 3

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NC Code 1, 2, & 3

**NC Code 1:** COOL is not listed.

**NC Code 2:** Checkbox with absent marking.

**NC Code 3:** Checkbox with unclear marking.
NC Code 4a, 4b, 4c – Unacceptable Form

- Appropriate when the country of origin is not stated in an acceptable form.

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>4a</td>
<td>The country of origin is not stated in an acceptable form. The use of “or” and “and/or” and “may contain” is not acceptable.</td>
</tr>
<tr>
<td>4b</td>
<td>The country of origin is not stated in an acceptable form. The regional designation or the term, “locally grown” does not provide sufficient origin declaration.</td>
</tr>
<tr>
<td>4c</td>
<td>The country of origin is not stated in an acceptable form. Production steps for meat muscle cuts are not present or not stated in an acceptable form.</td>
</tr>
</tbody>
</table>

NC Code 4a

- Disjunctive (“or,” “and/or”) and ambiguous (“may contain”) COOL statements are not acceptable.

NC Code 4b

- Indistinct localities, continent names, compass points, or regions comprised of more than one country are not acceptable in lieu of the country of origin.
NC Code 4c

- Meat muscle lacking accurate production step information (born, raised, harvested) are cited with NC code 4c.
- *Imported meat do not require production steps.

NC Code 4c

- Some muscle cut meat labels may contain multiple errors (non-distinct region; “or” disjunction; missing production steps).
- In these situations, default to 4c – “Production Steps Are Not Present.”

NC Code 5 – Spelling and Abbreviations

- Improper spelling or abbreviations of the country of origin are not acceptable.
NC Code 5

Example: The images below are examples of unacceptable COOL, and warrant NC code 5:

- Belt Fish sign states “VIET/Wild”
- Lime with sign states “MEX”

NC Code 6 – Missing MOP

- Only Fish and shellfish commodities are required to be labeled with the method of production (MOP).

<table>
<thead>
<tr>
<th>Code</th>
<th>Non-Compliance Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>Covered commodity is not identified with the method of production.</td>
</tr>
</tbody>
</table>

NC Code 6 – Missing MOP

- Acceptable MOP include:
  - Wild, Wild-Caught
  - Farm, Farmed, Farm-Raised
- NC code 6 only applies to fish and shellfish
- An NC code 6 may be assigned irrespective of the presence or absence of country of origin.
- The MOP is not required to be near the origin declaration; they may be on opposite sides of the item (common for pre-labeled frozen items).
NC Code 6 – Missing MOP

Example:
- Basa Filets are missing MOP
- Lake Perch Fillet is missing MOP

NC Code 7 – MOP Illegible and/or Inconspicuous

- MOP is present; however, it is covered, smeared, obstructed, or not indicated on checkbox.

*Applies only to Fish and Shellfish.

NC Code 7 – MOP Illegible and/or Inconspicuous

Example: Both examples show there are checkboxes to indicate the MOP; however, the MOP is not selected.
**NC Code 8 – Inaccurate MOP**

- Both Farm-Raised and Wild-Caught are declared to the consumer.
  
  *Applies only to Fish and Shellfish.

<table>
<thead>
<tr>
<th>Code</th>
<th>Non-Compliance Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>8</td>
<td>The method of production declaration is <strong>not</strong> accurate at point of sale.</td>
</tr>
</tbody>
</table>

**Example:** Store sign below declares both Farm-Raised and Wild as the MOP.

**NC Code 9 – MOP Not in Acceptable Form**

- MOP is not stated in an acceptable form
- MOP is not stated in one of these acceptable forms:
  - Wild, Wild-Caught
  - Farm, Farmed, Farm-Raised

*Applies only to Fish and Shellfish.
NC Code 9 – MOP Not Acceptable

Example: Store signs below are examples of unacceptable MOP.

Multiple NC Codes

➢ There are instances when multiple NC codes on a single commodity are warranted.
➢ Multiple codes are NOT to be used for indecision, but rather specific situations when more than 1 Non-compliance is observed.
➢ Most common: NC1 and NC6 on fish / shellfish items.

Multiple NC Codes

NC code 3 and NC code 5 apply
Multiple NC Codes

NC code 2 and NC code 7 apply

NC Code 10 – No Records within 5 business days
- Records were not provided within 5 business days from the day of the review.
- Day 1 is the day after the review is conducted.

<table>
<thead>
<tr>
<th>Code</th>
<th>Non-Compliance Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>10</td>
<td>Records were not provided within 5 business days.</td>
</tr>
</tbody>
</table>

NC Code 11 – No Country of Origin on Records
- The records provided did not include country of origin.
- The country of origin can be abbreviated on records only provided the retailer can accurately decipher it.

<table>
<thead>
<tr>
<th>Code</th>
<th>Non-Compliance Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>Records do not provide the country of origin information.</td>
</tr>
</tbody>
</table>
**NC Code 12 – No MOP on Records**

- The records provided did not include method of production.
- MOP can be abbreviated on records only provided the retailer can accurately decipher it.

<table>
<thead>
<tr>
<th>Code</th>
<th>Non-Compliance Findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>12</td>
<td>Records do not provide the method of production information.</td>
</tr>
</tbody>
</table>

**NC Code 13 – No Supplier Information on Records**

- Multiple records can be provided to show the supplier's information.
- The required supplier information includes name and address (city/state).

<table>
<thead>
<tr>
<th>Code</th>
<th>Non-Compliance Findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>13</td>
<td>Records do not provide the Supplier information. (Supplier records are required for all Traceback Items)</td>
</tr>
</tbody>
</table>

**NC Code 14 – Record’s COO**

- Example: Master container states Brazil as the country of origin; however, store sign states product of Peru.

<table>
<thead>
<tr>
<th>Code</th>
<th>Non-Compliance Findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>14</td>
<td>Records information for country of origin as provided by supplier is not accurately conveyed to point of sale label.</td>
</tr>
</tbody>
</table>
NC Code 15 – Record’s MOP

- Example: Invoice states Farm-Raised as the method of production; however, store sign states Wild-caught.

<table>
<thead>
<tr>
<th>Code</th>
<th>Non-Compliance Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>15</td>
<td>Records information for method of production as provided by supplier is not accurately conveyed to point of sale label.</td>
</tr>
</tbody>
</table>

NC Code 16 – Records for Pre-labeled item

- Records identifying the immediate previous source for a pre-labeled item were not provided within 5 business days.

<table>
<thead>
<tr>
<th>Code</th>
<th>Non-Compliance Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>16</td>
<td>Records that identify the chain of custody for the pre-labeled item were not provided within 5 business days.</td>
</tr>
</tbody>
</table>

Activity 5

Identify the COOL Violation
COOL School

Acceptable or NOT?

Acceptable or NOT?
Acceptable or NOT?

Acceptable or NOT?

Activity 6

Thought Provoking Situations and Counting Covered Commodities
Conducting Retail Reviews

3 Step Process

**Step 1:** Review all guidance documents and prepare the Workbook.

**Step 2:** Conduct COOL Surveillance Review at the retail establishment.

**Step 3:** Submit Workbook to USDA COOL Division.

---

**Step 1:** Review and Prepare Workbook
Step 1– Review
Do Your Homework
➢ Review:
  • Final Rule, 7 CFR Parts 60 and 65
  • Amended Final Rule, effective May 23, 2013
  • Meat Muscle Cut Labeling Information Sheet

Step 1– Review
Do Your Homework (continued)
➢ Review:
  • COOL Surveillance Review Procedures for Retail Facilities
  • NC Codes for Retail Reviews
  • COOL Workbook, dated April 10, 2014
  • Previous Year's Workbook

USDA Recommendation
New Reviewers are encouraged to shadow an experienced reviewer at least once.
Step 1 – Download Workbook

- All COOL training materials can be downloaded from the COOL website www.ams.usda.gov/cool

Click here to obtain a copy of the COOL Workbook!

Step 1 – Workbook Tabs

- Prepare the COOL Workbook
  - The Workbook contains 2 Excel spreadsheets (2 tabs)
    - Information Form
    - Follow-up Review Checklist – Information entered in this tab will automatically populate in the Information Form.
Step 1 – Prepare Workbook

- The retail store assignment list provides the following:
  - Review Number (i.e., AZ 15 F0245A)
  - Retailer Name, Address, and Phone Number
- Type this information in the top portion of the Workbook.
- Also type your name and contact information.
- Save

Step 1 – Save Workbook

- Download the Workbook and “Save As” with the file name provided by COOL:
  - State Initials (TX)
  - Fiscal Year (15)
  - Review Number (F9867A)
- Example: TX 15 F9867A

Pre-Assigned Review Number

- Review numbers that start with “N” indicate store location was not reviewed the previous year.
- Review numbers that start with “P” indicate store location was reviewed previously and results warranted another review.
FY 15 Retail Review Assignment

All Retail Reviews assigned for Fiscal Year 2015 will be Follow-up Reviews!

Step 1 - Complete

Step 2:
Part A: Opening Meeting
Part B: Conduct Review
Part C: Recordkeeping
Part D: Closing Meeting
Step 2:
Part A: Opening Meeting

Part A – Opening Meeting

➢ Upon arrival at the retail store, the reviewer shall:
  • Introduce themselves as a representative of USDA with an official picture identification.
  • Request a meeting with the store manager, counter manager, or other appropriate official.

Part A – Opening Meeting

➢ Conduct a short meeting with the responsible authority.
  • Explain the scope and objective of the review.
  • Provide a short summary of what you will be looking for by providing a copy of the Information Sheet.
  • Also, provide a copy of the Meat Muscle Cut Labeling Information Sheet.
Part A – Opening Meeting

➢ Advise Responsible Authority:
  • Records for 3 or 5 items will be requested during the retail review.
  • The items selected for records are chosen at random.
  • Records can be maintained at the retail store or in a remote location.
  • If needed retailer has 5 business days to provide records.

Part A – Opening Meeting

➢ Advise Responsible Authority:
  • A follow-up review is being conducted because of previous noncompliance’s observed. Note: If the retailer failed to respond to the previous findings, inform them they are responsible for responding to the noncompliance letter mailed by USDA.

Part A – Retailer Handouts

Mandatory Country of Origin Labeling Information Sheet

Meat Muscle Cut Labeling Information Sheet
Warning!

- Do not confront an angry, belligerent or non-cooperative facility representative!!

- If the facility representative refuses to cooperate with the review, contact your state COOL Manager with the information.

Store Closed

- If the store is closed upon arrival:
  - Take a picture of the front of the store.
  - Submit the workbook with the File Name, Date Reviewed, Store Information, and Reviewer’s Information.
  - Select “Store Closed” in the “Finding Identified?” field.
  - In the Comments section, describe store was closed upon arrival.
  - Submit workbook.
Retailer Changed Ownership

- If the store changed ownership or name:
  - Take a picture of the front of the store.
  - Ask Responsible Authority the details of the store name change (i.e., When did ownership change?).
  - In the Comments section, record the details provided by the responsible authority.
  - Proceed to conduct the review.

Part A – Verify Retailer Information

- Ask responsible authority to verify the store name, address, and phone information are correct.
- Request:
  - Store Representative Name
  - Responsible Authority Name
  - Corporate Contact E-mail (if any)
  - Responsible Authority’s Store E-mail Address (if any)

Part A – Answer Questions

- Answer any questions pertaining to the review or the COOL regulation.
- Inform the store representative that they are welcome to accompany you during the review.
- Ask store representative who you should request records from (i.e., meat manager)
- Confirm the time and place for the closing meeting.
Step 2:  
Part B: Conduct Review

Part B - Conduct Review

- Review all covered commodity categories
  - Produce Department (fresh and frozen fruits and vegetables; ginseng)
  - Baking Aisle (nuts: raw peanuts, pecans, macadamia nuts)
  - Meat Department (fresh and frozen beef, veal, pork, lamb, goat, chicken)
  - Seafood Department (fresh and frozen fish and shellfish)

Part B – Conduct Review

- Review all covered commodities in all locations
  - Full-service counters
  - Frozen items display cases
  - Self-service areas, sale counters and promotional displays
Part B – Recording Findings

- Record any findings observed. The more information the better!
  - Gala Apples, sold in bulk
  - Oranges, 5 lb bags
  - Frozen Dole Strawberries, 1.5 lb best by 8/2010
  - Previously Frozen Whole Salmon in Fresh Cooler

Part B – Recording Findings

- Describe the item in the non-complying items(s) column of the workbook.
- Record the applicable NC code(s). Remember, there may be more than one NC code per item.

Part B – Take a Picture

- When conducting Follow-up Reviews a picture of every non-compliance must be taken.
- Pictures will be submitted with workbook once Follow-up Review is completed.
Part B – Notes Section

- Further clarification is required for all NC codes except 1 and 6.
- Example:
  - NC code 3: Store label states USA; however, PLU sticker states Peru.
  - NC code 4b: Packaged stated grown in Big Valley Farm.
  - NC code 4c: Fresh meat display sign stated “Product of USA.” No production steps.

Part B – Checklist

- Enter all non-compliance information into the Workbook on the Checklist tab in the appropriate commodity sections.
- Be sure to be descriptive as you are our “eyes and ears”.

Part B – Checklist

- If no commodities were present in a given section, apply an X in the “Not sold in store” field.
Part B – Checklist

➢ Enter Number of Items Reviewed. This is the total number of commodities reviewed for the section.
  • Example: Retail store sold Gala apples, Fiji apples, Granny Smith apples, and Red Delicious apples in the fruit section. A total of 4 items reviewed will be recorded in the fruits section.

<table>
<thead>
<tr>
<th>Number of Items Reviewed</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fruits</td>
<td></td>
</tr>
<tr>
<td>Gala</td>
<td></td>
</tr>
<tr>
<td>Fiji</td>
<td></td>
</tr>
<tr>
<td>Granny Smith</td>
<td></td>
</tr>
<tr>
<td>Red Delicious</td>
<td></td>
</tr>
</tbody>
</table>

Part B – Checklist

➢ Capitalize 1st letter of item’s name.
➢ Select correct NC code(s).
➢ Provide notes describing the NC(s).

<table>
<thead>
<tr>
<th>Number of Items Reviewed</th>
<th>8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vegetables</td>
<td></td>
</tr>
<tr>
<td>Green Peppers</td>
<td></td>
</tr>
<tr>
<td>Store-age date before</td>
<td></td>
</tr>
<tr>
<td>FLU deliver states SRA</td>
<td></td>
</tr>
</tbody>
</table>

Part B – Checklist

➢ Use proper spelling, grammar, and punctuation.
➢ Include as much information as possible (brand name, pack size, etc.) so the retailer knows which items to address.
➢ If you need additional space use the Additional Item page.

<table>
<thead>
<tr>
<th>Number of Items Reviewed</th>
<th>12</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Complying Reason</td>
<td></td>
</tr>
<tr>
<td>NC Code</td>
<td></td>
</tr>
<tr>
<td>Notes</td>
<td></td>
</tr>
</tbody>
</table>
Part B – Numerous Items

➢ There are instances when so many items are found to be non-compliant, it is not necessary to list each one.
➢ Record in appropriate commodity section.
➢ Group items with different NC codes separately.

Step 2:
Part C: Recordkeeping

Part C – Requesting Records

Regulatory Requirements (7 CFR §65.500):
➢ Retailers are required to maintain records used in the normal course of business that verify a country of origin claim.
➢ Records may be maintained in any location and in any format.
➢ Records are used to identify the covered commodity, the retailer’s immediate previous supplier and the country of origin (and method of production in the case of fish and shellfish).
➢ Records are required to be maintained for a period of one year from the date the origin declaration is made at retail.
Part C – Requesting Records

Follow-Up Review assignment distributed to the state managers will indicate the commodity categories assigned for records review.

The number of recordkeeping items assigned depends on the store’s past compliance:

- 5 recordkeeping items are assigned for stores earning “Critical Weakness” rating.
- 3 recordkeeping items are assigned for stores earning “Compliance Deficient” rating.

Select an item for records review using the categories assigned.

- Example: If category P (Pork Muscle Cut) is assigned, you could choose a package of pork chops.

If no items are sold within the assigned category, then:

- Go to the next category within the same color group.
- Example: If category P was assigned but the store doesn’t sell any pork muscle cuts, then stay within the pink group and choose a Ground Pork item (Q).
Part C – Requesting Records

- If no items are sold within the color category, then:
  - Go to the top of the entire chart and select an item in the first unassigned color section.
  - Example: If category P and Q were not sold in store, then go to the top. If fruits weren’t already assigned, select a Fresh Fruit (A).

- Do not cite retailers for what you casually saw in the freezer while walking by a master container.
- A covered commodity must always be chosen as a record item unless no items within that color group or any other groups are sold at retail.

Part C: Definition: Pre-Labeled

- A covered commodity that has the commodity’s country of origin and method of production (fish and shellfish) and the name and place of business (city and state) of the manufacturer, packer, or distributor...
  - On the covered commodity itself,
  - On the package in which it is sold to the consumer, or
  - On the master shipping container.
Part C: Pre-labeled Item – Requesting Records

- For Pre-labeled items, retailers must provide:
  - A record that verifies the retailer's immediate previous supplier (name, city and state).
- The record is not required to have the country of origin or method of production because that is printed on the pre-labeled item.

Part C: Non Pre-Labeled Item – Requesting Records

- For items that are NOT Pre-labeled, retailer must provide:
  - A record that verifies the country of origin, method of production (if applicable) AND retailer's immediate previous supplier (name, city and state).
- Various records may be provided to verify country of origin, method of production and immediate previous supplier.

Part C – Actual Group Reviewed

- Select Actual Group Reviewed by using the drop down field.
Part C – Item Description

➢ Enter Item Description and Country of Origin located on store label.
➢ Enter Item Description and Country of Origin located on record provided.

Part C – Records Reviewed

➢ Select Record Reviewed by using the drop down field.
➢ Workbook will allow you to enter information for up to 3 records.

Part C – Record Transaction ID

➢ For the Record Transaction ID enter all pertinent tracking information such as invoice number, UPC, PLU, establishment number, lot number, batch number, product number, package size, PO number, etc.
➢ Describe dates taken from records: order date, delivery date, invoice date, packed date, best if used by date, etc.
Part C – Immediate Previous Supplier (IPS)

- For the Retailer's IPS Supplier field enter the information for the supplier that directly delivered commodity to the retailer.
- In the Additional Supplier Information field, enter supplier information listed on the pre-labeled item, fax numbers, phone numbers, and websites.

Part C – Records Provided or Pending

- Select Provided for the Records field if records were provided while conducting the retail review.
- Select Pending for the Records field if the retailer will require 5 business days to provide records and enter Date Due field.
  - Day 1 begins the day after the review is conducted. Example: if review is conducted on a Monday, records will be due next Monday.

Complete all recordkeeping sections as thoroughly as possible! More on that in future slides.
Part C - Tips

- Information obtained for a recordkeeping item will be used to conduct a Supplier Traceback Audit to verify accuracy of COOL.
- Obtain information from records that identify the commodity and transaction specifically such as UPC, PLU, Lot #, Est. #, production code, and sell by date.

Part C – Invoice Sample

- Supplier’s Name and Address
- Invoice Number
- Delivery Date
- Invoice Date
- Country of Origin

Part C – Master Container

- Box Serial #:2762060
- Pack Date: 4/06/15
- Establishment #: 244C
- 09615CNC0117 01
- Net Weight lbs. 15.4
- Use by: 4/27/15

*If you are not sure what a number is, just write it down.
Part C – Consumer Package

- Product Code: A12080P
- UPC: 051933 21140 7
- Distributed by: Save-A-Lot Foods Store, LTD, Earth City, MO 63015
- Product of Guatemala
- Best by: may be listed
- Product size: may be listed

Part C – Consumer Package

Product Description:
Red Tart Cherries
pitted
Net Wt. 20 oz.

Product Code:
FSM328007 20:50
Best by Oct 2015
Product of Turkey

Part C – Consumer Package

Product Code:
USDA INSPECTED
Defeats harmful bacteria. Helps ensure food safety.

MSRP:

4/15/2015
### Step 1 – Complete Recordkeeping Section

<table>
<thead>
<tr>
<th>Field</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>House Name</td>
<td>ABC Supermarket Distribution Center #177</td>
</tr>
<tr>
<td>Address</td>
<td>321 Main St, Milwaukee, WI 53201</td>
</tr>
<tr>
<td>City &amp; State</td>
<td>Milwaukee, WI 53201</td>
</tr>
<tr>
<td>Phone Number</td>
<td>(414) 555-5555</td>
</tr>
<tr>
<td>Fax Number</td>
<td>(414) 555-5555</td>
</tr>
<tr>
<td>Email</td>
<td><a href="mailto:supermarket@abc.com">supermarket@abc.com</a></td>
</tr>
<tr>
<td>Website</td>
<td><a href="http://www.abc.com">www.abc.com</a></td>
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</table>

### Additional Information

- **Certified:** Yes
- **Inspected:** Yes
- **Facility:** ABC Supermarket Distribution Center
- **Supervisor:** Jane Doe
- **Supervisor Email:** jane.doe@abc.com
- **Supervisor Phone:** (414) 555-5555
- **Supervisor Fax:** (414) 555-5555
- **Facility Address:** 321 Main St, Milwaukee, WI 53201
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<table>
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<tr>
<th>Group Assigned</th>
<th>Actual Group Reviewed</th>
<th>J-Process M 15</th>
</tr>
</thead>
<tbody>
<tr>
<td>Country of Origin (Store Label)</td>
<td>Country of Origin (Store Record)</td>
<td></td>
</tr>
<tr>
<td>Method of Production (Store Label)</td>
<td>Method of Production (Store Record)</td>
<td></td>
</tr>
<tr>
<td>Remarks</td>
<td>Remarks</td>
<td></td>
</tr>
<tr>
<td>FS Supplier Name</td>
<td>FS Supplier Address</td>
<td></td>
</tr>
<tr>
<td>Additional Supplier Information</td>
<td>Additional Supplier Information</td>
<td></td>
</tr>
</tbody>
</table>

Step 2:
Part D: Closing Meeting

Non-compliances Corrected During the Review

- All non-compliances observed by the Reviewer **must** be reported to USDA even if they are corrected right away.
- Reviewer may include a note in the “Additional Comments and Information”
  - Example: “All fruit items with NC code 1 findings were corrected prior to leaving store”
Part D – Closing Meeting

- Provide Responsible Authority a copy of the completed Checklist;
- Discuss the results of the review and any findings identified;
- Verify name of Responsible Authority, email address, mailing address and phone number;

Part D – Closing Meeting

- Inform the Responsible Authority. **Findings are not official until reviewed by USDA:**
- If store received 4 or more noncompliance codes they will receive official notification from USDA requiring a response with corrective actions and preventative measures.

Part D – Closing Meeting

- Provide the Responsible Authority:
  - Your contact information in case they have questions, and
  - Records Request Form in case any records were pending to be submitted.
Step 2 - Complete

- Thank the Responsible Authority for their time and attention.

Step 3: Submit Workbook and Pictures

Step 3 – Post Review

- Enter all noncompliances into the workbook checklist as well as the recordkeeping information.
- Enter Yes or No in the “Findings Identified?” field.
- Click “Spell Check” and make any necessary corrections.
Step 3 – Comments Section

- This section will not print. It will only be viewed in Excel file.
- Area to explain an issue or note pertinent information that COOL Specialists may need.
- Note if a whole group of covered commodities are not available.

Step 3 – Comments Section

- If conducting a follow-up review, record whether or not previous findings were corrected.
- Make notation if store information has changed.

Step 3: Saving Pictures

- Pictures must be combined and saved in PDF or Word format.
- The picture file must be saved with the appropriate file name. For example: NY 15 F3941A Pictures
Step 3: Saving Pictures

- Do not include more than 4 pictures per page.

USDA Recommendation

Once Workbook and Pictures are complete, State Managers are encouraged to evaluate workbooks prior to submitting to USDA.

Step 3 – Submit Workbook and Pictures

**Important:** 2015 Follow-up Reviews and pictures will be submitted using Cloud Vault.

Note: Cloud Vault is a new service that is replacing AgnisX.
Step 3: Cloud Vault

- State Managers will receive two (2) emails directly from the Cloud Vault on behalf of COOLAudit@ams.usda.gov.
- Both emails will contain a hyperlink to access 2 separate folders in Cloud Vault.

Step 3: First Cloud Vault Email

- First email will include a hyperlink that contains previous year’s reviews.
- Email #1 subject is “COOLAudit@ams.usda.gov shared »2014 Reviews - New York« with you”. Your state name will appear instead of NY.

Step 3: Second Cloud Vault Email

- Second email will include a hyperlink to upload 2015 Follow-up Reviews.
- Email #2 subject is “COOLAudit@ams.usda.gov shared »2015 NE Region - Submitted Follow-ups« with you”. Your Region will appear instead of NE.
Step 3: Access Cloud Vault

➢ To access folder:
  • Click on the "View it!" hyperlink, or
  • Right click > Copy Hyperlink > Paste in IE, Google Chrome, Safari, or Firefox.

Caution: When using Cloud Vault you may have limited access using Internet Explorer (IE); however, you can use Google Chrome, Safari, or Firefox.

Step 3: Upload Workbook and Pictures

1. Click on “View it” hyperlink directly from the email. Make sure to use the email link named 2015 Region – Submitted Follow-ups.
Step 3: Upload Workbook and Pictures

2. Click on arrow (↑)

3. Select workbook and picture file from computer. Note: You can also drag and drop!

4. Workbook will appear on Cloud Vault. You can open files by clicking on the file name.

You have successfully submitted the 2015 Follow up Review and pictures using Cloud Vault!
Step 3 - Complete

Activity 7

What is wrong with this workbook?

Recap: 3-Step Procedure
COOL Captain
Contacts

COOL Specialist | Region | Phone Number | Email Address
---|---|---|---
Leslie Shavers | Acting Director | (202) 720-4486 | Leslie.Shavers@ams.usda.gov
Ken Becker | Team Lead | (202) 690-4118 | Kenneth.Becker@ams.usda.gov
Maribel Reyna | Pink | (202) 253-8870 | Maribel.Reyna@ams.usda.gov
Vickie Felder | Green | (202) 260-8341 | Vickie.Felder@ams.usda.gov
Cordell Givens | Red | (202) 260-8391 | Cordell.Givens@ams.usda.gov
Sean Kenworthy | Blue | (202) 205-9355 | Sean.Kenworthy@ams.usda.gov
Christy Wipperfurth | Yellow | (202) 258-8509 | Christy.Wipperfurth@ams.usda.gov
Carol Payne | Invoicing | (202) 720-3528 | Carol.Payne@ams.usda.gov
Tiffanie Smith | Admin. Assistant | (202) 720-4486 | Tiffanie.Smith@ams.usda.gov

COOL Specialist Region Phone Number Email Address
---|---|---|---
Leslie Shavers Acting Director (202) 720-4486 Leslie.Shavers@ams.usda.gov
Ken Becker Team Lead (202) 690-4118 Kenneth.Becker@ams.usda.gov
Maribel Reyna Pink (202) 253-8870 Maribel.Reyna@ams.usda.gov
Vickie Felder Green (202) 260-8341 Vickie.Felder@ams.usda.gov
Cordell Givens Red (202) 260-8391 Cordell.Givens@ams.usda.gov
Sean Kenworthy Blue (202) 205-9355 Sean.Kenworthy@ams.usda.gov
Christy Wipperfurth Yellow (202) 258-8509 Christy.Wipperfurth@ams.usda.gov
Carol Payne Invoicing (202) 720-3528 Carol.Payne@ams.usda.gov
Tiffanie Smith Admin. Assistant (202) 720-4486 Tiffanie.Smith@ams.usda.gov

Any Questions

Any Questions
Training Reimbursements

- Expenses related to traveling to COOL event:
  - Airfare and Baggage Expenses
  - Hotel (GSA Govt. room rate + tax)
  - Parking
  - Ground Transportation
  - Mileage
  - Meals and Incidental Expenses, per U.S. General Services Administration (GSA)
    - Rate = 75% on travel days and 100% on non-travel days.

Retail Review Reimbursements

- Completed Retail Reviews
  - Initial Retail Reviews not to exceed $600 each.
  - Follow-Up Retail Reviews not to exceed $800 each.

*All reviews must be submitted in accordance with the retail surveillance procedures. Reviews that are not conducted will not be paid by COOL.
When to Request Reimbursement

- Training Reimbursement must be submitted within 2 weeks after the training event.
- Retail Reviews must be submitted on the 1st of every month.

Required Documentation for Training Reimbursement

1. State Invoice in your agency’s letterhead must include:
   - State name and invoice number
   - Cooperative agreement number
   - Place and training date, number of trainees, and amount requesting for reimbursement
2. Signed SF-270 form
3. Receipts that prove travel expenses, except meals, for each person trained.

Required Documentation for Retail Review Reimbursement

1. State Invoice in your agency’s letterhead must include:
   - State name and invoice number
   - Cooperative agreement number
   - Total number of reviews and amount requested for reimbursement
2. Signed SF-270 form
3. List of Retail Reviews for which you’re requesting reimbursement.
Non-Reimbursable

- COOL will NOT reimburse:
  - Cost of oil change
  - Tire replacement or rotation
  - Parking violation or towing fees
  - Sight-seeing taxi or parking receipts
  - Per diem above the GSA daily approved amount.

Sample Invoice

Must have agreement number!
Must have covered dates!
Must have totals.
Must have address
Submit Reimbursement Request

Email: coolaudit@ams.usda.gov
or
Fax: (202) 354-5062

Reimbursement Questions?

- Carol Payne
  • (202) 720-3528
  • Carol.Payne@ams.usda.gov

- Maribel Reyna
  • (202) 253-8870
  • Maribel.Reyna@ams.usda.gov