





Module 3 AIVS Retail Review Procedures for All Reviews





Lesson Objectives

At the end of the lesson, you will be able to:

- Prepare for a retail review.
- Conduct an opening meeting.
- Conduct the retail review.
- Conduct a closing meeting.
- Enter the review results into the CRM system.
- Understand the retail reviews timeline.

Retail Reviews

- Retail reviews assess a retailer's compliance with the USDA COOL regulations.
- USDA determines which stores will be reviewed. State and Federal personnel conduct reviews on behalf of USDA.
- There are two types of reviews: Initial Reviews and Follow-Up Reviews.

Retail Review File Name

- Each review has a unique file name that is assigned by USDA.
- The file name includes 4 segments. File name CA22N2633:
 - CA Identifies the state where the retailer is located.
 - 22 Identifies the review cycle year.
 - N Identifies the type of review: "N" indicates an initial review and "F" indicates a follow-up review.
 - 2633 This is a unique identifier assigned by the BE-COOL CRM system.

Retail Review Updates for 2022

- Provide the retailer the COOL Retailer Fact Sheet instead of the Information Form.
- States will not be reimbursed for closed stores, instead closed stores must be replaced with another location to review.
- Results of retail reviews are not final until reviewed by USDA and USDA will send results via email to the retailer. You <u>must</u> collect their email address and let them know this.
- If a retailer states they are not subject to a PACA license, still complete the review and include a note within the review in CRM. USDA will investigate it once the review is submitted to USDA.

Requirement for All Managers and Reviewers

- Reviewers must be "COOL-Certified" before doing reviews. This involves completing the training (ideally live) and passing the exam in ProProfs.
- Reviewers and Managers must score 85% or higher on the exam to be "COOL-Certified".
- Additionally, Managers who are assigned follow-up reviews, and Reviewers conducting follow-up reviews, must take the follow-up training and pass the follow-up review exam.

Review Quick Tips

- Ensure the store is open.
- Know what type of review you will be conducting (initial or a follow-up).
- Bring your business card and the Retailer Fact Sheet with you to hand out to the representative.
- Keep USDA's phone number handy in case you run into any issues that your Manager cannot resolve. 202-720-4486.

Opening Meeting for All Reviews

- Upon arrival, go to the customer service desk and introduce yourself.
- Offer your business card and briefly explain why you're there – to conduct a COOL retail review.
- Ask to speak with the store manager or person in charge, then introduce yourself to them and offer the COOL Retailer Fact Sheet.

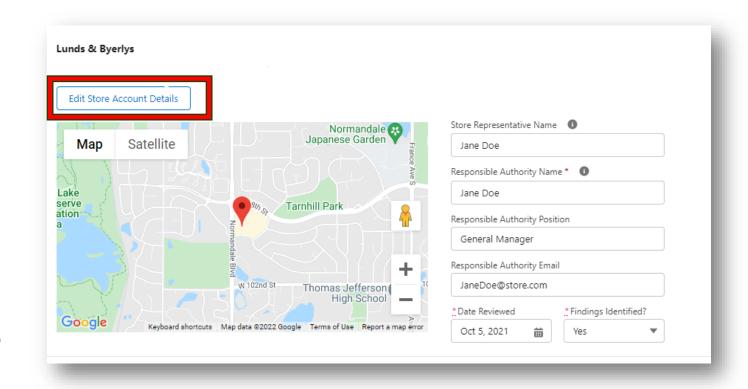


Opening Meeting for All Reviews (cont.)

- Let the store manager or representative know you are there to conduct a COOL retail review and what they can expect.
- Confirm the store's name, address, and phone number. Obtain the representative's name, and the responsible authority's name, title and email address – this is who will receive the final report.
- Inform the representative that there will be a closing meeting. This includes asking questions about recordkeeping procedures (Initial Review) or requesting records (Follow-Up Review).
- Invite them to join you on the review and encourage them to ask questions.

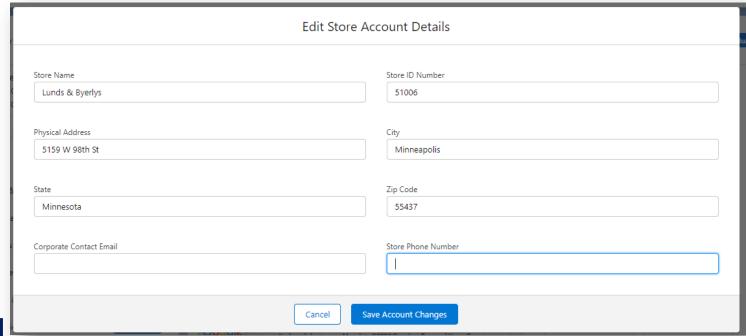
Inputting Store Details in CRM

- Section 1: Store Details
 - Information collected during the opening meeting, such as the store representative's name, the responsible authority's name, position and email address, are entered here.
 - If the store's actual address / phone number is different than shown in CRM, please go to Edit Store Account Details.



Editing Account Details in CRM

- You may edit store details here.
- Please remember to press Save Account Changes.
- Ensure you obtain the email address. Official results will be provided from USDA via email.



Review of Covered Commodities

- After the opening meeting, begin the review:
 - Count the number of covered commodities in each of the 6 commodity categories.
 - Review all covered commodities for labeling compliance. If a section of the store is temporarily closed off, return to that section towards the end of the review. If that section of the store still cannot be reviewed, note in the BE-COOL CRM system.
 - Record all noncompliant items and the noncompliance code(s) in the correct commodity category in the CRM system. Be sure to include appropriate details.
 - Answer questions from store personnel regarding COOL.

Review of Covered Commodities (cont.)

Review all sections of the retail store to evaluate

all COOL covered commodities for labeling compliance, including:

- Produce department;
- Baking aisle;
- Meat department;
- Seafood department;
- Full-service counters;
- Grab and Go areas by registers; and
- Sale counters and promotional displays.





Counting Covered Commodities

- Count the total number of items reviewed for each of the 6 covered commodity categories:
 - 1. Fruits (fresh and frozen);
 - 2. Vegetables (fresh and frozen);
 - 3. Chicken (muscle cut and ground);
 - 4. Lamb, and Goat meat (muscle cut and ground);
 - 5. Fish and Shellfish (fresh and frozen);
 - 6. Peanuts, Pecans, and Macadamia Nuts, and Ginseng.
- Write the totals for each commodity category in the appropriate section of the BE-COOL CRM system for "Number of Items Reviewed."

Counting Covered Commodities (cont.)

- Generally, a stock keeping unit (SKU) is counted as one item.
 - An organic 6 oz. bag of carrots and a conventional 6 oz. bag of carrots have different SKUs therefore are counted as 2 commodities.
 - Bananas in the produce section and bananas by the cash register that have the same SKU are counted as 1 commodity.
- <u>Do not</u> count the individual number of each item. A bulk bin that has 30 oranges counts as 1 covered commodity for the fruit section, and not 30 commodities.



Knowledge Check

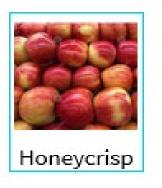
Knowledge Check (cont)









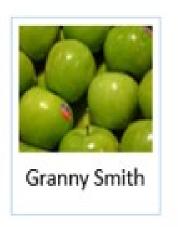


You review Gala, Fuji, Granny Smith, Red Delicious and Honeycrisp apples. How many covered commodities have you reviewed?

Knowledge Check (cont.)











Answer: You have reviewed 5 items. This would go towards your total count for the fruit category.

Conducting Retail Reviews

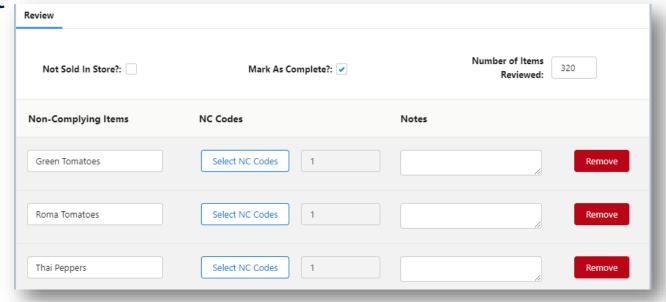
- Document noncompliant items. Noncompliance codes will be discussed in Module 4.
- Include the exact item name (brand, weight, size, organic).
- List the appropriate noncompliance code(s).
- Include notes in the BE-COOL CRM system to indicate the issue observed. For example: Store sign says USA, PLU sticker says Canada.
- NC 1 and NC 6 do not need notes included.

Common Mistakes

- Citing incorrect noncompliance code.
- Incomplete or incorrect information in the noncompliance notes area. This should fully identify the commodity.
- Listing a noncompliant item in the wrong commodity section. For example, a fruit noncompliant item should be in the fruit section.
- "24 additional items" is <u>not</u> acceptable.
 - All noncompliant items must be <u>individually</u> identified with the corresponding noncompliance code. This is key from an evidentiary standpoint.

Inputting NC Items in CRM

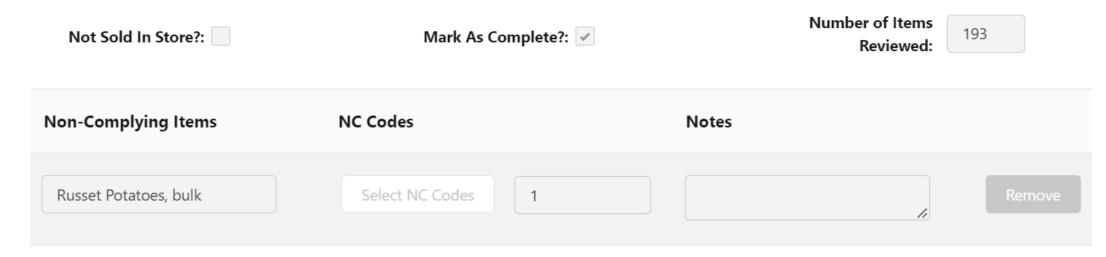
- 1. If the commodity category is not present in store, check "Not Sold in Store."
- 2. Enter the Number of Items Reviewed.
- 3. If noncompliant items are observed, input the item name, select the noncompliant (NC) code(s), and include notes.
- 4. Check "Mark As Complete?" once that section is completed.



Example of a Complete Workbook

Please be as specific as possible when listing out commodities.

- Example: 6 oz organic carrots instead of just "carrots".
- Example: Russet Potatoes, bulk.



Closing Meeting

- For an <u>Initial Review</u>, ask the 5 recordkeeping questions of the store representative if this wasn't already done during the opening meeting. For a <u>Follow-Up Review</u>, request records.
- Discuss findings of the review with the representative and provide the unofficial copy of the review. Inform the representative that the "Results are not final until reviewed by USDA".
- Verify the retailer's <u>email address</u>. Inform them that USDA will provide the official results and communicate with them via email.
- Answer any additional questions and thank them for their time and assistance.



Initial Retail Review

Initial Retail Review

When conducting an initial retail review, the reviewer will:

- Count and review all covered commodities sold at the retail location.
- Record noncompliant items and the appropriate noncompliance code(s) 1-9 in the BE-COOL CRM system.
- Ask the responsible authority the 5 interview questions.
 - Enter the responsible authority's response for each of the 5 questions. Be as accurate as possible.



Initial Retail Review: 5 Interview Questions

Ask the 5 interview questions during either the opening or closing meeting.

- 1. What types of records used in the normal course of business are received from suppliers that you rely on to create your own labels, such as signs, placards, and scale printers?
- 2. Where are records maintained?
- 3. How long are records maintained?
- 4. As the responsible store authority, please briefly explain your knowledge of COOL requirements and your systems to ensure compliance.
- 5. Would you be interested in receiving additional outreach materials and guidance from FDLD to assist your staff and consumers?

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After the Review: Submit to USDA

- Input your findings and completely fill out the information in the BE-COOL CRM system.
- Submit the review to your State or Federal Manager for review.
- State and Federal Managers must check the review in CRM and have the reviewer correct any errors. Once the review is accurate and complete, the Manager submits the review in CRM to USDA.
- USDA will evaluate reviews and return to the Manager if need be. Reviews are not eligible for reimbursement until USDA evaluates them and no corrections are needed. 27

Timeline for Retail Review Process

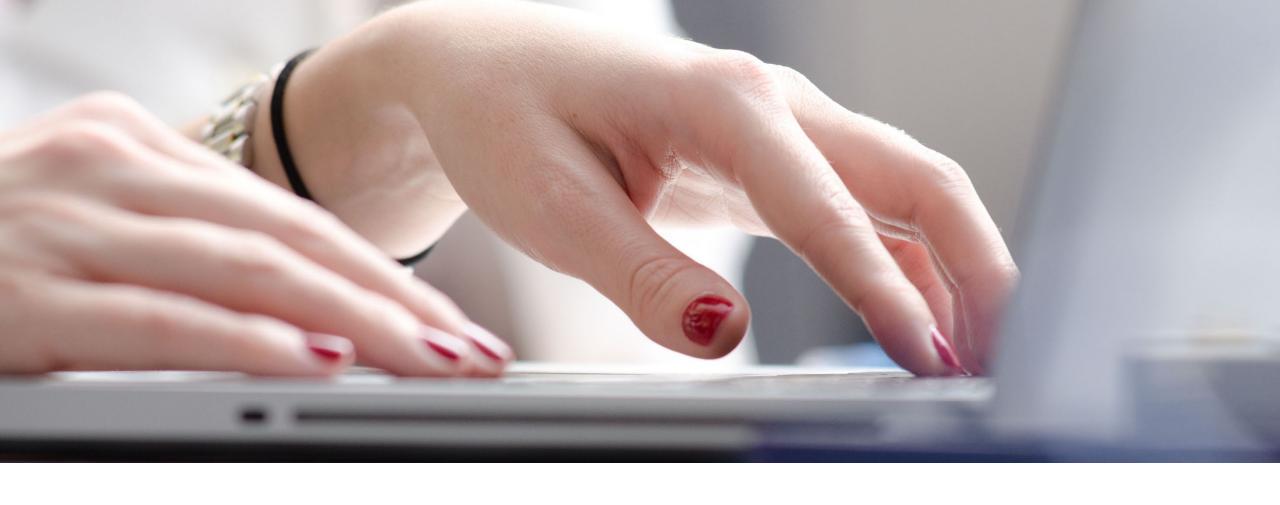
- COOL-certified reviewers begin their retail review assignments within 30 days of when state assignments are received.
- 50% of retail review assignment is completed and submitted to the USDA within 3 months of the initial assignment unless prevented by uncontrollable factors and communicated to the Federal Agency.
- Ensure that retail reviews are promptly submitted to the USDA within 14 calendar days of the review being conducted.
- Ensure retail review assignments are completed and submitted by the deadline(s) provided by the Federal Agency.

Retail Review Reminders

- Inform the retailer that results are not final until reviewed by USDA, and if a Noncompliance Letter is required, USDA will send it via email to the retailer.
- State and Federal Managers must review workbooks for accuracy and completeness, and attest they've checked them, prior to submitting to USDA.
- Reviews will be returned from USDA for revision if they are not completed correctly. Reviews will not be eligible or reimbursement until evaluated by USDA.



Questions?



Thank you for completing Module 3!