LAKESHORE REGIONAL ENTITY

2012-2020

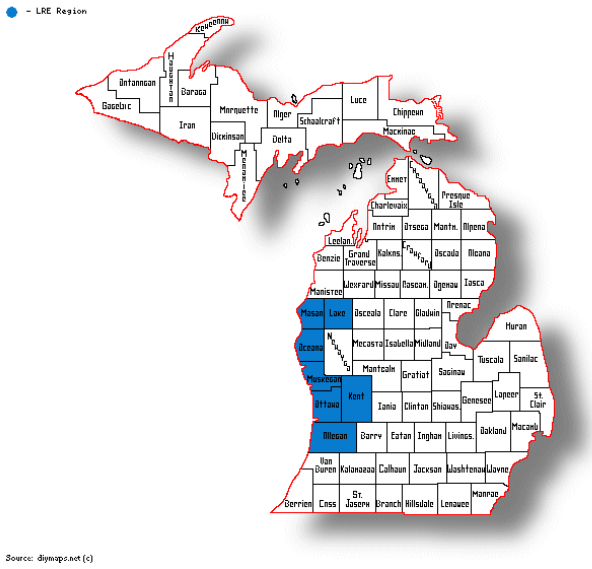
Tobacco Sales Compliance Regional Analysis

LAKESHORE REGIONAL ENTITY

BY REFOCUS, L.L.C.

Tobacco Compliance Checks Longitudinal Analysis, 2012-2020

The Lakeshore Regional Entity (LRE) manages Medicaid, Michigan General Fund, and Substance Abuse Treatment Block Grant funding for Behavioral Health services in a seven-county region along the Lake Michigan shoreline in west Michigan. As a part of its mission, LRE supports county level substance abuse prevention coalitions in each of its constituent counties. A part of this support is provided through the "No Cigs For Our Kids" campaign, which focuses on educating tobacco vendors in the region regarding the importance of compliance with the Youth Tobacco Act. Funding enables the substance abuse prevention coalitions in the region to work with local law enforcement agencies to ensure that tobacco sales establishments do not sell tobacco products to minors. These compliance checks have been occurring in several of the region's counties since 2011 and, over the last four years have occurred in each of the region's seven counties.



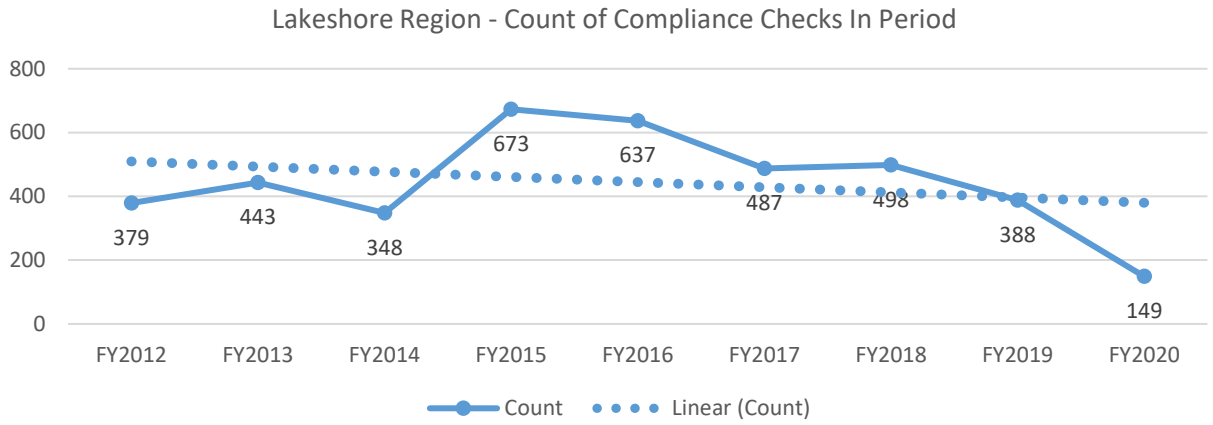
The purpose of this analysis is to utilize the data that each county has collected through the compliance check process to analyze results, find possible trends, make recommendations for improvements to the compliance check process, and ensure compliance with the Synar Amendment of 1992. "In July 1992, Congress enacted the Alcohol, Drug Abuse, and Mental Health Administration Reorganization Act (PL 102-321), which includes an amendment (section 1926) aimed at decreasing youth access to tobacco. This amendment, named for its sponsor, Congressman Mike Synar of Oklahoma, requires states … to enact and enforce laws prohibiting the sale or distribution of tobacco products to individuals under the age of 18. States must comply with the Synar Amendment in order to receive their full Substance Abuse Prevention and Treatment Block Grant (SABG) awards."[1] Among other standards, the Synar Regulations require that states conduct annual, unannounced inspections that provide a valid probability sample of tobacco sales outlets accessible to minors. The regulations also require that the non-compliance rate in the state be no more than twenty percent (20%).

This analysis was completed by ReFocus, L.L.C. (referred to in this document as "the evaluators") under contract with LRE. In 2016 the evaluators gathered all non-Synar (with police involvement) and Synar (without police involvement) compliance check records that could be provided by each county as far into the past as data was available. The evaluators then merged all counties' data into a single database that will support ongoing evaluation efforts into the future. It should be noted that several counties collected information about the compliance check results in different formats and the scope of the information collected differed significantly. Thus, the evaluators had to painstakingly work with the data on a cell by cell basis to ensure it was reliably brought into a single database. Following this process, LRE

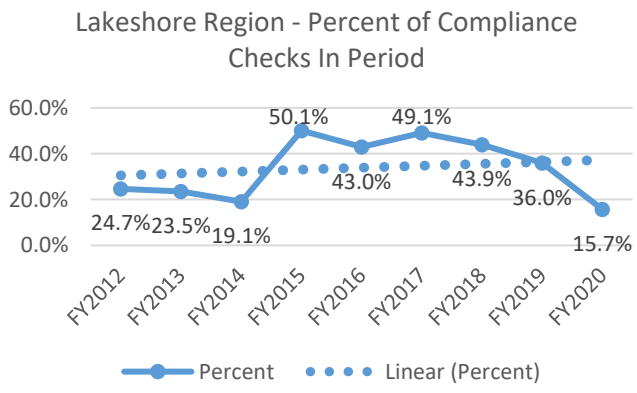
[1] https://www.samhsa.gov/synar/about

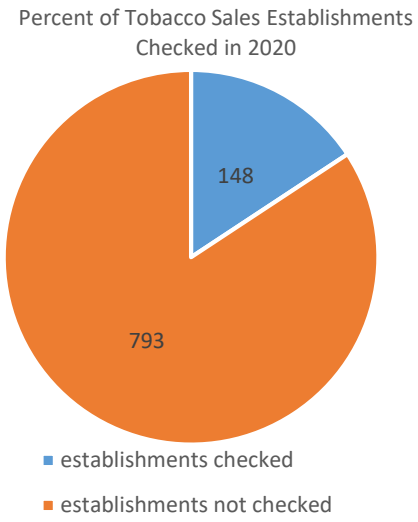
worked with the evaluators and county coalitions to develop a uniform dataset to be collected at each compliance check.

This analysis includes all **non-Synar** compliance checks reported to the evaluators between fiscal years 2012 and 2020. The graph below displays the total count of non-Synar compliance checks in the region. The solid blue line displays trends in the actual number of compliance checks completed during each fiscal year. The dotted blue line displays the trend across all years reported. It shows a slight decrease over time. There was a significant decrease in the count of compliance checks completed during FY2020. This was most likely due to restrictions put in place by the State of Michigan in response to the COVID-19 pandemic.



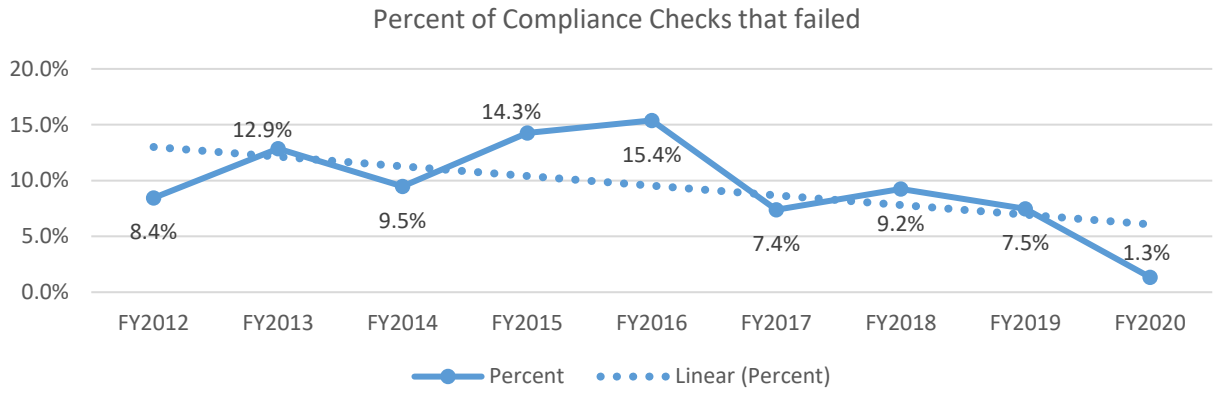
The graphs below display a different picture of the scope of compliance checks (see Attachment A for county and annual detail). It shows, among reporting counties, the percent of tobacco sales establishments that were checked during each year. The percent of tobacco selling establishments checked hit a high of 50.1% in 2015. The percent of compliance checks in period hit its lowest percentage in 2020, again most likely due to the COVID-19 pandemic response.



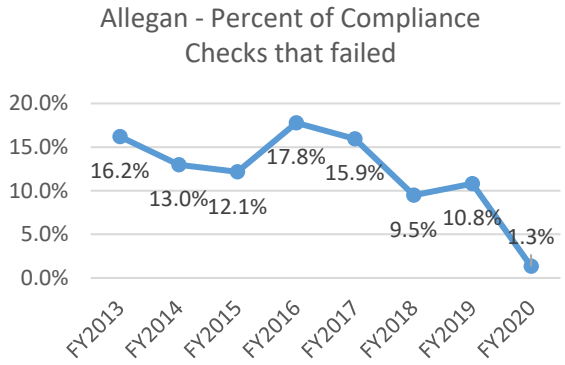


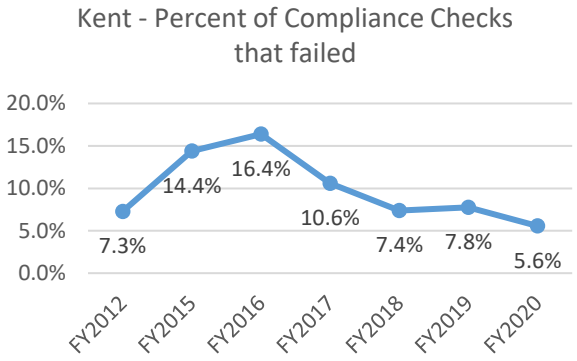
Tobacco Compliance Checks Longitudinal Analysis, 2012-2020

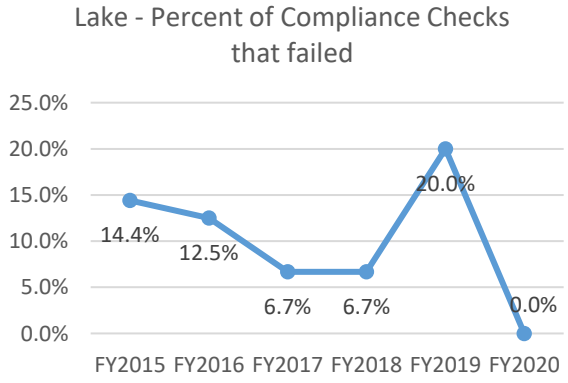
The graph below displays the percent of compliance checks reported per year in the LRE region that failed. Tobacco sales to minors have remained below the twenty percent (20%) threshold established by the Synar Amendment since 2012, with the current percentage being 1.3%. In 2020 no counties in the LRE region performed at or above that threshold.

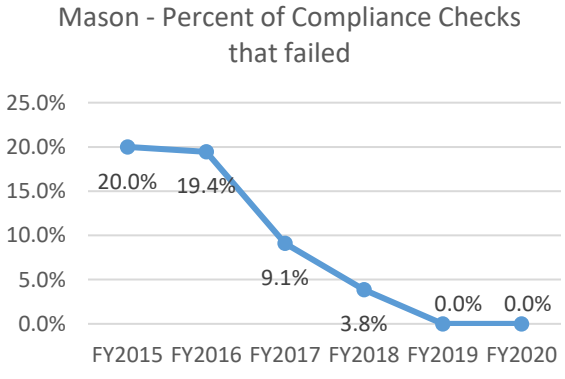


The graphs below display this same information for each county.

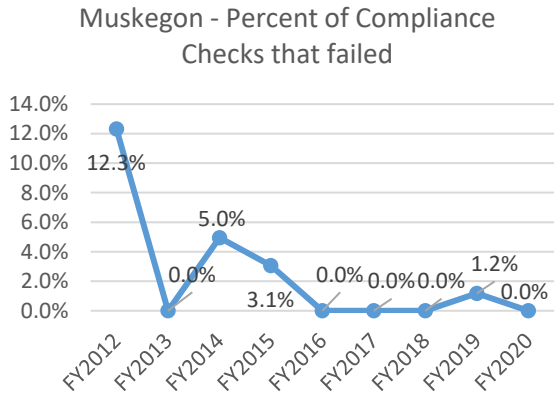


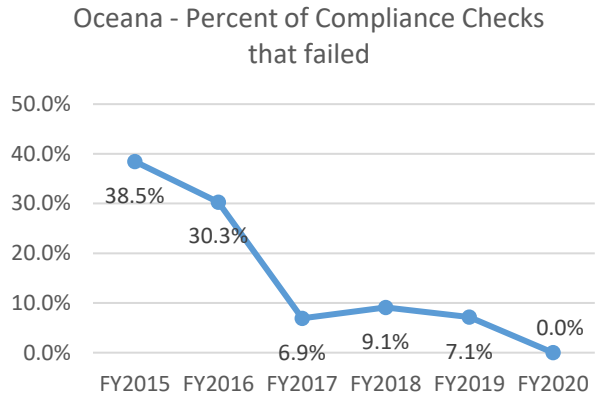


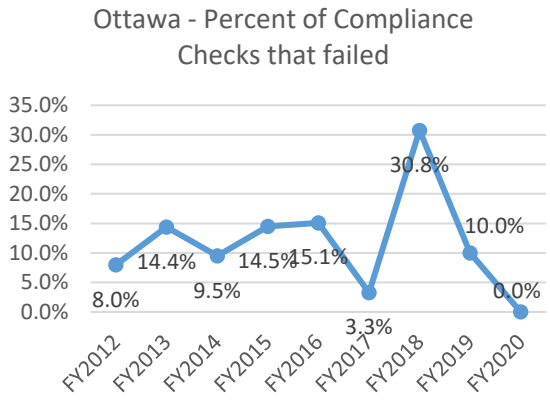




Tobacco Compliance Checks Longitudinal Analysis, 2012-2020







These graphs indicate several key conclusions. First, five of seven counties had no compliance failures during FY2020. Second, Muskegon County as sustained a failure rate of at or near 0% for the five consecutive years.

The chart below displays information regarding the environmental conditions at the tobacco sales establishments that failed compliance checks in the LRE region in 2020 (see Attachment B for county level data by year). This information uses the new retail categories established by the State of Michigan. It shows that nearly 45% of compliance failures occur within the "other" category, which includes convenience stores, followed by 31% occurring at gas stations.

FY2020	Count of Failed Compliance Checks	Of Fails, Percent at Gas Station	Of Fails, Percent at Tobacco Store	Of Fails, Percent at Restaurant	Of Fails, Percent at Hotel	Of Fails, Percent at Grocery Store	Of Fails, Percent at Drug Store	Of Fails, Percent at Other
Allegan	1	100%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Kent	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100%
Lake	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mason	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Muskegon	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Oceana	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ottawa	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
LRE Region	2	50%	0.00%	0.00%	0.00%	0.00%	0.00%	50%

Tobacco Compliance Checks Longitudinal Analysis, 2012-2020

ATTACHMENT A:

FY2020	County Population (2010 Census)	Count of Tobacco sales establishments	Tobacco sales establishments per 10,000 citizens	Count of Tobacco sales establishments checked (Non-Synar)	Percent of Tobacco sales establishments checked	Count of Non-Synar Compliance Checks	Ave Times Establishments were checked	Count of Failed Compliance Checks	Failed compliance checks per 10,000 citizens	Percent of compliance checks that failed
Allegan	111408	92	0.83	75	81.5%	75	1.00	1	0.01	1.3%
Kent	602622	444	0.74	18	4.1%	18	1.00	1	0.00	5.6%
Lake	11539	16	1.39	5	31.3%	5	1.00	0	0.00	0.0%
Mason	28705	34	1.18	5	14.7%	5	1.00	0	0.00	0.0%
Muskegon	172188	153	0.89	23	15.0%	23	1.00	0	0.00	0.0%
Oceana	26570	32	1.20	9	28.1%	10	1.11	0	0.00	0.0%
Ottawa	263801	170	0.64	13	7.6%	13	1.00	0	0.00	0.0%
LRE Region	1216833	941	0.77	148	15.7%	149	1.01	2	0.00	1.3%

FY2019	County Population (2010 Census)	Count of Tobacco sales establishments	Tobacco sales establishments per 10,000 citizens	Count of Tobacco sales establishments checked (Non-Synar)	Percent of Tobacco sales establishments checked	Count of Non-Synar Compliance Checks	Ave Times Establishments were checked	Count of Failed Compliance Checks	Failed compliance checks per 10,000 citizens	Percent of compliance checks that failed
Allegan	111408	92	0.83	89	96.7%	111	1.25	12	0.11	10.8%
Kent	602622	443	0.74	100	22.6%	103	1.03	8	0.01	7.8%
Lake	11539	16	1.39	9	56.3%	10	1.11	2	0.17	20.0%
Mason	28705	34	1.18	15	44.1%	15	1.00	0	0.00	0.0%
Muskegon	172188	152	0.88	66	43.4%	85	1.29	1	0.01	1.2%
Oceana	26570	32	1.20	14	43.8%	14	1.00	1	0.04	7.1%
Ottawa	263801	168	0.64	44	26.2%	50	1.14	5	0.02	10.0%
LRE Region	1216833	937	0.77	337	36.0%	388	1.15	29	0.02	7.5%

Tobacco Compliance Checks Longitudinal Analysis, 2012-2020

FY2018	County Population (2010 Census)	Count of Tobacco sales establishments	Tobacco sales establishments per 10,000 citizens	Count of Tobacco sales establishments checked (Non-Synar)	Percent of Tobacco sales establishments checked	Count of Non-Synar Compliance Checks	Ave Times Establishments were checked	Count of Failed Compliance Checks	Failed compliance checks per 10,000 citizens	Percent of compliance checks that failed
Allegan	111408	91	0.82	71	78.0%	95	1.34	9	0.08	9.5%
Kent	602622	444	0.74	182	41.0%	230	1.26	17	0.03	7.4%
Lake	11539	16	1.39	15	93.8%	15	1.00	1	0.09	6.7%
Mason	28705	34	1.18	26	76.5%	26	1.00	1	0.03	3.8%
Muskegon	172188	149	0.87	43	28.9%	58	1.35	0	0.00	0.0%
Oceana	26570	32	1.20	22	68.8%	22	1.00	2	0.08	9.1%
Ottawa	263801	167	0.63	51	30.5%	52	1.02	16	0.06	30.8%
LRE Region	1216833	933	0.77	410	43.9%	498	1.21	46	0.04	9.2%

FY2017	County Population (2010 Census)	Count of Tobacco sales establishments	Tobacco sales establishments per 10,000 citizens	Count of Tobacco sales establishments checked (Non-Synar)	Percent of Tobacco sales establishments checked	Count of Non-Synar Compliance Checks	Ave Times Establishments were checked	Count of Failed Compliance Checks	Failed compliance checks per 10,000 citizens	Percent of compliance checks that failed
Allegan	111408	90	0.81	68	75.6%	69	1.01	11	0.10	15.9%
Kent	602622	439	0.73	149	33.9%	151	1.01	16	0.03	10.6%
Lake	11539	16	1.39	14	87.5%	15	1.07	1	0.09	6.7%
Mason	28705	34	1.18	33	97.1%	33	1.00	3	0.10	9.1%
Muskegon	172188	151	0.88	73	48.3%	99	1.36	0	0.00	0.0%
Oceana	26570	32	1.20	29	90.6%	29	1.00	2	0.08	6.9%
Ottawa	263801	166	0.63	90	54.2%	91	1.01	3	0.01	3.3%
LRE Region	1216833	928	0.76	456	49.1%	487	1.07	36	0.03	7.4%

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Tobacco Compliance Checks Longitudinal Analysis, 2012-2020

FY2016	County Population (2010 Census)	Count of Tobacco sales establishments	Tobacco sales establishments per 10,000 citizens	Count of Tobacco sales establishments checked	Percent of Tobacco sales establishments checked	Count of Compliance Checks	Ave Times Establishments were checked	Count of Failed Compliance Checks	Failed compliance checks per 10,000 citizens	Percent of compliance checks that failed
Allegan	111408	90	0.81	89	98.9%	135	1.52	24	0.22	17.8%
Kent	602622	536	0.89	193	36.0%	238	1.23	39	0.06	16.4%
Lake	11539	16	1.39	16	100.0%	16	1.00	2	0.17	12.5%
Mason	28705	31	1.08	30	96.8%	36	1.20	7	0.24	19.4%
Muskegon	172188	149	0.87	65	43.6%	73	1.12	0	0.00	0.0%
Oceana	26570	32	1.20	29	90.6%	33	1.14	10	0.38	30.3%
Ottawa	263801	362	1.37	101	27.9%	106	1.05	16	0.06	15.1%
LRE Region	1216833	1216	1.00	523	43.0%	637	1.22	98	0.08	15.4%

FY2015	County Population (2010 Census)	Count of Tobacco sales establishments	Tobacco sales establishments per 10,000 citizens	Count of Tobacco sales establishments checked	Percent of Tobacco sales establishments checked	Count of Compliance Checks	Ave Times Establishments were checked	Count of Failed Compliance Checks	Failed compliance checks per 10,000 citizens	Percent of compliance checks that failed
Allegan	111408	90	0.81	88	97.8%	107	1.22	13	0.12	12.1%
Kent	602622	536	0.89	262	48.9%	271	1.03	39	0.06	14.4%
Lake	11539	16	1.39	15	93.8%	15	1.00	3	0.26	20.0%
Mason	28705	31	1.08	32	103.2%	32	1.00	10	0.35	31.3%
Muskegon	172188	149	0.87	74	49.7%	98	1.32	3	0.02	3.1%
Oceana	26570	32	1.20	26	81.3%	26	1.00	10	0.38	38.5%
Ottawa	263801	362	1.37	112	30.9%	124	1.11	18	0.07	14.5%
LRE Region	1216833	1216	1.00	609	50.1%	673	1.11	96	0.08	14.3%

Tobacco Compliance Checks Longitudinal Analysis, 2012-2020

ATTACHMENT B:

FY2020	Count of Failed Compliance Checks	Of Fails, Percent at Gas Station	Of Fails, Percent at Tobacco Store	Of Fails, Percent at Restaurant	Of Fails, Percent at Hotel	Of Fails, Percent at Grocery Store	Of Fails, Percent at Drug Store	Of Fails, Percent at Other
Allegan	1	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Kent	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%
Lake	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mason	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Muskegon	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Oceana	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ottawa	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
LRE Region	2	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	50.00%

FY2019	Count of Failed Compliance Checks	Of Fails, Percent at Gas Station	Of Fails, Percent at Tobacco Store	Of Fails, Percent at Restaurant	Of Fails, Percent at Hotel	Of Fails, Percent at Grocery Store	Of Fails, Percent at Drug Store	Of Fails, Percent at Other
Allegan	12	25.00%	0.00%	0.00%	0.00%	25.00%	0.00%	50.00%
Kent	8	25.00%	0.00%	0.00%	0.00%	0.00%	50.00%	25.00%
Lake	2	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	50.00%
Mason	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Muskegon	1	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Oceana	1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%
Ottawa	5	40.00%	0.00%	0.00%	0.00%	0.00%	0.00%	60.00%
LRE Region	29	31.03%	0.00%	0.00%	0.00%	10.34%	13.79%	44.83%

Tobacco Compliance Checks Longitudinal Analysis, 2012-2020

FY2018	Count of Failed Compliance Checks	Of Fails, Percent at Grocery Store	Of Fails, Percent at Convenience Store	Of Fails, Percent at Gas Station	Of Fails, Percent at Restaurant	Of Fails, Percent at Bar/Lounge	Of Fails, Percent at Pharmacy	Of Fails, Percent at Bowling Alley	Of Fails, Percent at Liquor Store	Of Fails, Percent at Tobacco Store/Shop	Of Fails, Percent at Retail/Dept. Store
Allegan	9	11.11%	11.11%	66.67%	0.00%	0.00%	66.67%	0.00%	0.00%	0.00%	0.00%
Kent	17	11.76%	47.06%	29.41%	0.00%	0.00%	11.76%	0.00%	0.00%	0.00%	0.00%
Lake	1	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Mason	1	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Muskegon	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Oceana	2	0.00%	50.00%	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Ottawa	16	25.00%	37.50%	62.50%	0.00%	0.00%	6.25%	0.00%	6.25%	0.00%	0.00%
LRE Region	46	15.22%	36.96%	50.00%	0.00%	0.00%	19.57%	0.00%	2.17%	0.00%	0.00%

FY2017	Count of Failed Compliance Checks	Of Fails, Percent at Grocery Store	Of Fails, Percent at Convenience Store	Of Fails, Percent at Gas Station	Of Fails, Percent at Restaurant	Of Fails, Percent at Bar/Lounge	Of Fails, Percent at Pharmacy	Of Fails, Percent at Bowling Alley	Of Fails, Percent at Liquor Store	Of Fails, Percent at Tobacco Store/Shop	Of Fails, Percent at Retail/Dept. Store
Allegan	11	27.27%	18.18%	45.45%	9.09%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Kent	16	6.25%	25.00%	62.50%	0.00%	0.00%	0.00%	0.00%	0.00%	6.25%	0.00%
Lake	1	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Mason	3	33.33%	66.67%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Muskegon	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Oceana	2	0.00%	50.00%	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Ottawa	3	0.00%	66.67%	33.33%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
LRE Region	35	14.29%	34.29%	51.43%	2.86%	0.00%	0.00%	0.00%	0.00%	2.86%	0.00%

Lakeshore Regional Entity

Tobacco Compliance Checks Longitudinal Analysis, 2012-2020

FY2016	Count of Failed Compliance Checks	Of Fails, Count where clerk was male	Of Fails, Percent where clerk was male	Of Fails, Percent where clerk was female	Of Fails, Percent at Grocery Store	Of Fails, Percent at Convenience Store	Of Fails, Percent at Gas Station	Of Fails, Percent at Restaurant	Of Fails, Percent at Bar/Lounge	Of Fails, Percent at Pharmacy	Of Fails, Percent at Bowling Alley	Of Fails, Percent at Liquor Store	Of Fails, Percent at Tobacco Store/Shop	Of Fails, Percent at Retail/Dept. Store
Allegan	24	17	70.83%	29.17%	25.00%	20.83%	50.00%	0.00%	0.00%	0.00%	0.00%	4.17%	0.00%	0.00%
Kent	39	4	10.26%	89.74%	2.56%	25.64%	46.15%	0.00%	0.00%	10.26%	0.00%	0.00%	0.00%	0.00%
Lake	2	2	100.00%	0.00%	0.00%	50.00%	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Mason	7	6	85.71%	14.29%	14.29%	14.29%	57.14%	0.00%	0.00%	0.00%	0.00%	14.29%	0.00%	0.00%
Muskegon	0		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/a
Oceana	10	8	80.00%	20.00%	20.00%	20.00%	60.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Ottawa	16	7	43.75%	56.25%	0.00%	25.00%	62.50%	0.00%	0.00%	0.00%	0.00%	6.25%	0.00%	6.25%
LRE Region	98	44	44.90%	55.10%	10.20%	23.47%	52.04%	0.00%	0.00%	4.08%	0.00%	3.06%	0.00%	1.02%

FY2015	Count of Failed Compliance Checks	Of Fails, Count where clerk was male	Of Fails, Percent where clerk was male	Of Fails, Percent where clerk was female	Of Fails, Percent at Grocery Store	Of Fails, Percent at Convenience Store	Of Fails, Percent at Gas Station	Of Fails, Percent at Restaurant	Of Fails, Percent at Bar/Lounge	Of Fails, Percent at Pharmacy	Of Fails, Percent at Bowling Alley	Of Fails, Percent at Liquor Store	Of Fails, Percent at Tobacco Store/Shop	Of Fails, Percent at Retail/Dept. Store
Allegan	13	9	69.23%	30.77%	15.38%	23.08%	61.54%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Kent	39	18	46.15%	53.85%	10.26%	30.77%	51.28%	0.00%	0.00%	5.13%	0.00%	0.00%	0.00%	0.00%
Lake	3		0.00%	100.00%	0.00%	66.67%	33.33%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Mason	10		0.00%	100.00%	30.00%	40.00%	30.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Muskegon	3		0.00%	100.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Oceana	10		0.00%	100.00%	30.00%	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%
Ottawa	18	6	33.33%	66.67%	11.11%	27.78%	61.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
LRE Region	96	33	34.38%	65.63%	14.58%	32.29%	47.92%	0.00%	0.00%	2.08%	0.00%	0.00%	0.00%	2.08%

Tobacco Compliance Checks Longitudinal Analysis, 2012-2020

FY2014	Count of Failed Compliance Checks	Of Fails, Count where clerk was male	Of Fails, Percent where clerk was male	Of Fails, Percent where clerk was female	Of Fails, Percent at Grocery Store	Of Fails, Percent at Convenience Store	Of Fails, Percent at Gas Station	Of Fails, Percent at Restaurant	Of Fails, Percent at Bar/Lounge	Of Fails, Percent at Pharmacy	Of Fails, Percent at Bowling Alley	Of Fails, Percent at Liquor Store	Of Fails, Percent at Tobacco Store/Shop	Of Fails, Percent at Retail/Dept. Store
Allegan	17	14	82.35%	17.65%	0.00%	17.65%	82.35%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Muskegon	5		0.00%	100.00%	0.00%	20.00%	80.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Ottawa	11	4	36.36%	63.64%	0.00%	27.27%	72.73%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
LRE Region	33	18	54.55%	45.45%	0.00%	21.21%	78.79%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

FY2013	Count of Failed Compliance Checks	Of Fails, Count where clerk was male	Of Fails, Percent where clerk was male	Of Fails, Percent where clerk was female	Of Fails, Percent at Grocery Store	Of Fails, Percent at Convenience Store	Of Fails, Percent at Gas Station	Of Fails, Percent at Restaurant	Of Fails, Percent at Bar/Lounge	Of Fails, Percent at Pharmacy	Of Fails, Percent at Bowling Alley	Of Fails, Percent at Liquor Store	Of Fails, Percent at Tobacco Store/Shop	Of Fails, Percent at Retail/Dept. Store
Allegan	23	17	73.91%	26.09%	4.35%	34.78%	60.87%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Ottawa	34	19	55.88%	44.12%	2.94%	17.65%	73.53%	0.00%	0.00%	0.00%	0.00%	2.94%	2.94%	0.00%
LRE Region	57	36	63.16%	36.84%	3.51%	24.56%	68.42%	0.00%	0.00%	0.00%	0.00%	1.75%	1.75%	0.00%

FY2012	Count of Failed Compliance Checks	Of Fails, Count where clerk was male	Of Fails, Percent where clerk was male	Of Fails, Percent where clerk was female	Of Fails, Percent at Grocery Store	Of Fails, Percent at Convenience Store	Of Fails, Percent at Gas Station	Of Fails, Percent at Restaurant	Of Fails, Percent at Bar/Lounge	Of Fails, Percent at Pharmacy	Of Fails, Percent at Bowling Alley	Of Fails, Percent at Liquor Store	Of Fails, Percent at Tobacco Store/Shop	Of Fails, Percent at Retail/Dept. Store
Kent	14		0.00%	100.00%	7.14%	35.71%	35.71%	7.14%	0.00%	0.00%	0.00%	14.29%	0.00%	0.00%
Muskegon	9		0.00%	100.00%	0.00%	33.33%	66.67%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Ottawa	9	5	55.56%	44.44%	0.00%	22.22%	44.44%	0.00%	0.00%	11.11%	0.00%	22.22%	0.00%	0.00%
LRE Region	32	5	15.63%	84.38%	3.13%	31.25%	46.88%	3.13%	0.00%	3.13%	0.00%	12.50%	0.00%	0.00%