



2012-2019



Tobacco Sales Compliance Regional Analysis

LAKESHORE REGIONAL ENTITY

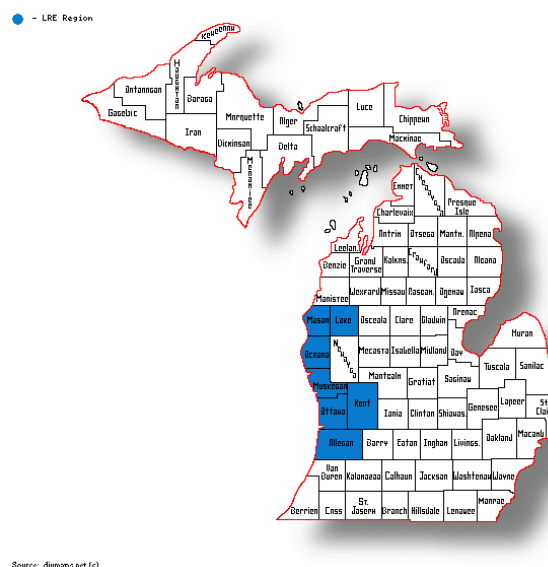
BY REFOCUS, L.L.C.

Tobacco Compliance Checks Longitudinal Analysis, 2012-2019

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 three 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



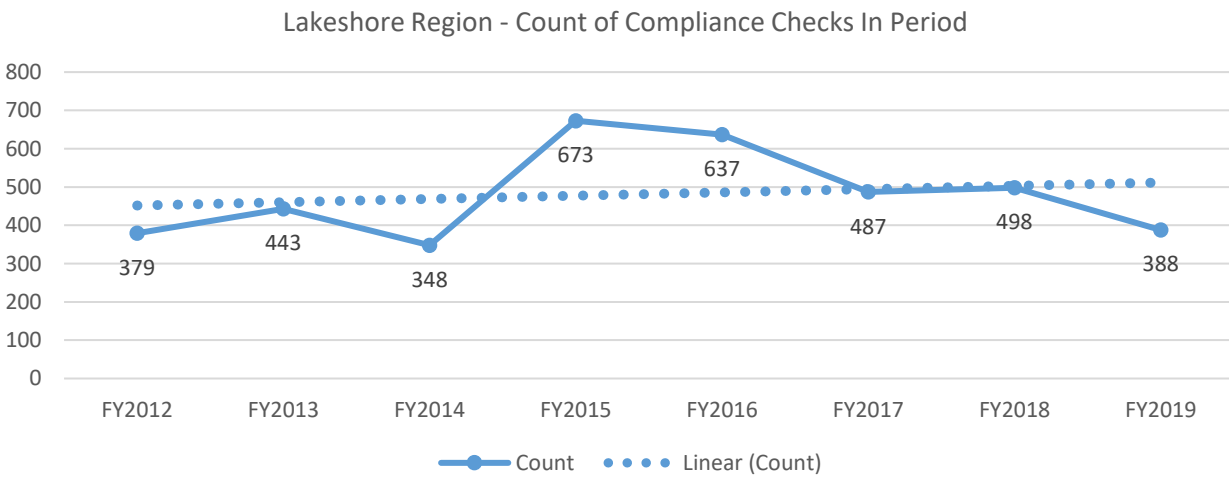
Source: dynmap.net (c)

¹ <https://www.samhsa.gov/synar/about>

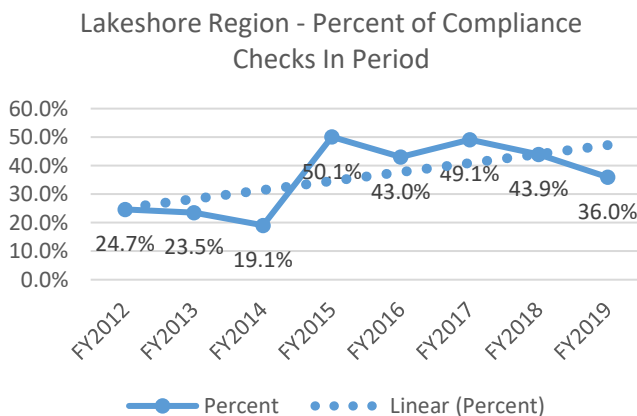
Tobacco Compliance Checks Longitudinal Analysis, 2012-2019

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

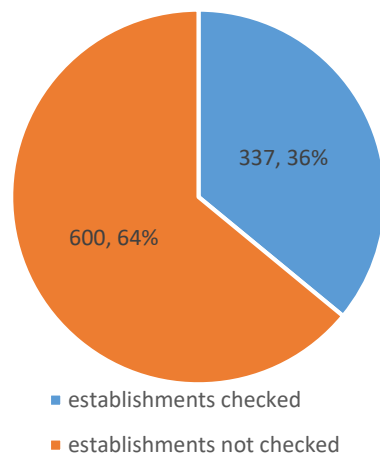
This analysis includes all **non-Synar** compliance checks reported to the evaluators between fiscal years 2012 and 2019. The graph below displays the total count of non-Synar compliance checks in the region. The solid blue line displays trends in the actual number of compliance checks completed during each fiscal year. The dotted blue line displays the trend across all years reported. It shows a positive increase over time; however, only 2015 through 2019 include a complete set of data from each county. This subset demonstrates a decreasing trend in the count of compliance checks completed per year.



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.

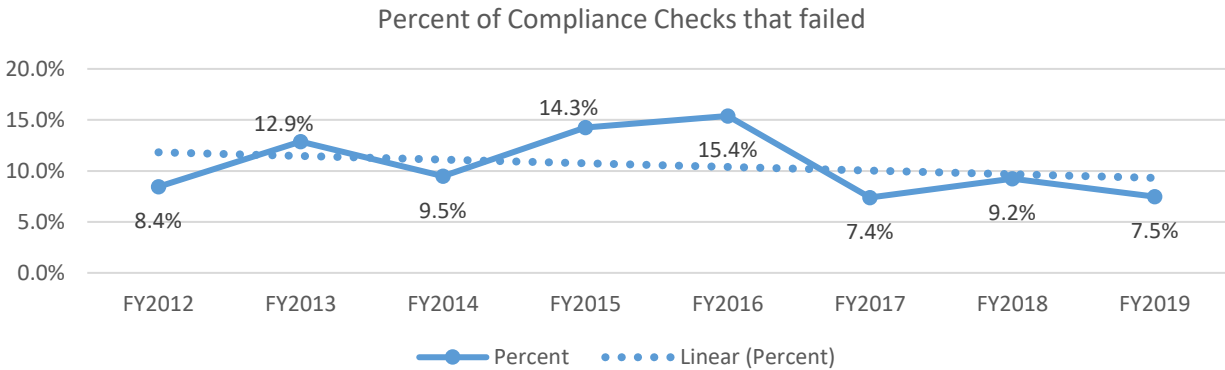


Percent of Tobacco Sales Establishments Checked in 2019

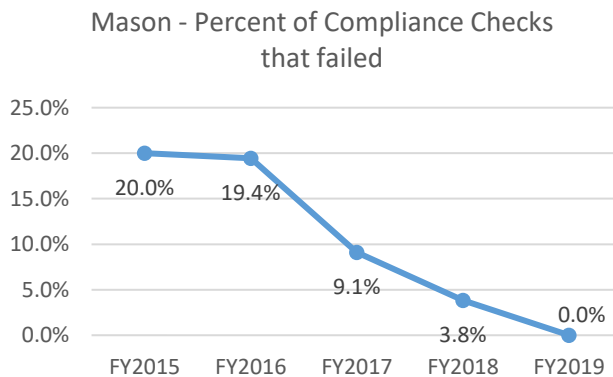
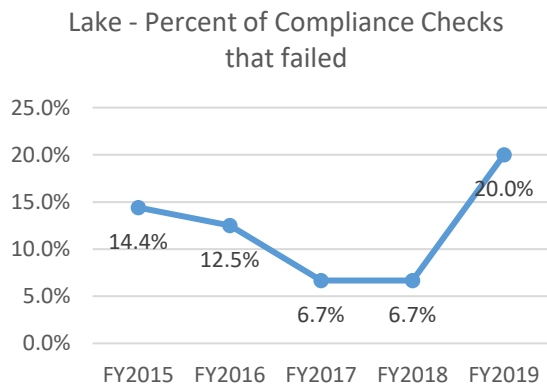
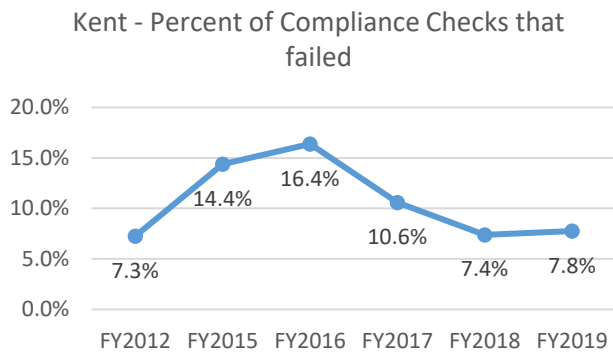
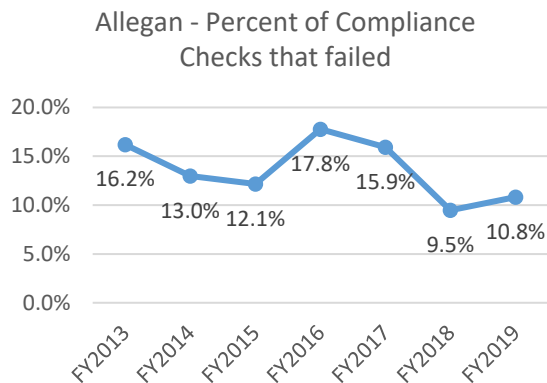


Tobacco Compliance Checks Longitudinal Analysis, 2012-2019

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 7.5%. In 2019 one county (Lake) in the LRE region performed at or above that threshold (20.0% = 2 of 10 checks).

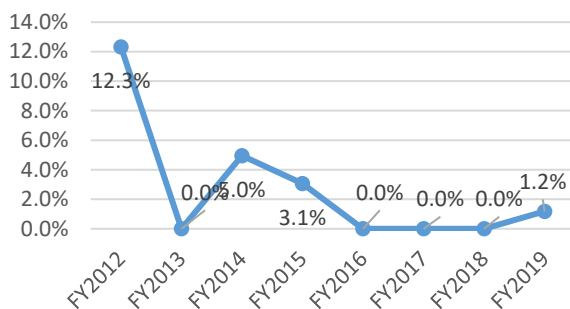


The graphs below display this same information for each county.

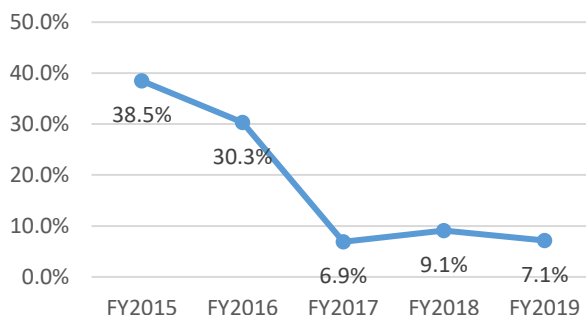


Tobacco Compliance Checks Longitudinal Analysis, 2012-2019

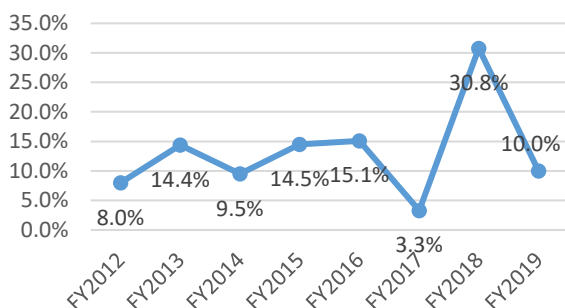
Muskegon - Percent of Compliance Checks that failed



Oceana - Percent of Compliance Checks that failed

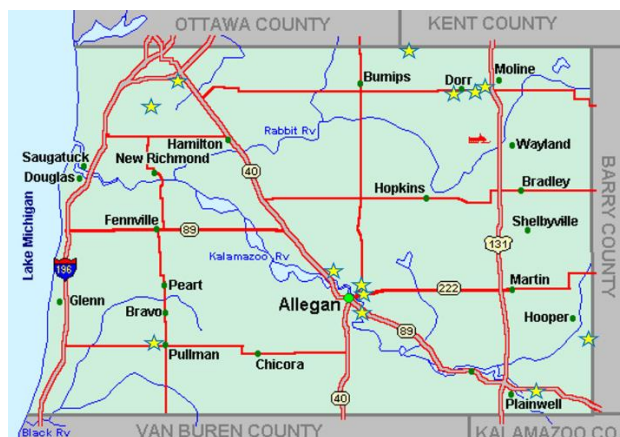


Ottawa - Percent of Compliance Checks that failed



These graphs indicate several key conclusions. First, Allegan, Kent, Mason and Oceana counties have sustained a noteworthy decrease in compliance failures over the last two years. Second, Muskegon County has sustained a failure rate of at or near 0% for the fourth year in a row.

The following maps evaluate compliance check failure trends in 2019 on the basis of geographic location. The map to the right is of Allegan County. Each star included on the map represents a compliance check failure at that location. Two continuing trends are noteworthy in Allegan County. First, there appears to be an issue with tobacco sales to minors occurring in and around the city of Allegan. Second, there appear to be issues with tobacco sales establishments along 142nd Avenue between Dorr and US131.

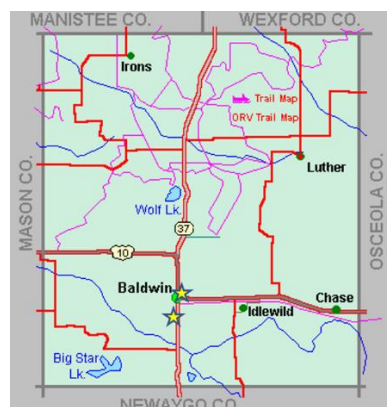


Tobacco Compliance Checks Longitudinal Analysis, 2012-2019

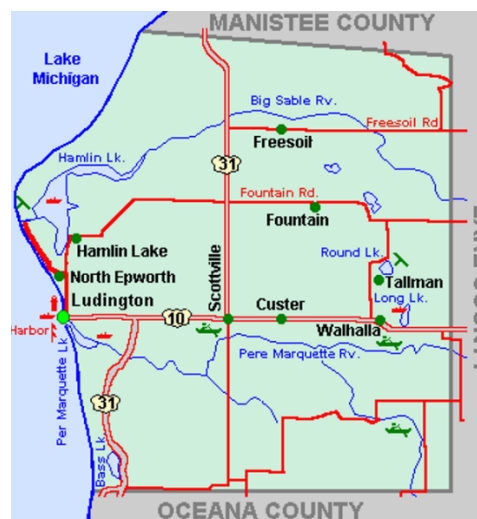
The Kent County map to the right displays compliance check failures. The map shows that, with the exception of two failures at one retailer in Cedar Springs, all compliance check failures occurred on the northwest side of Grand Rapids. Of the 103 compliance checks that occurred in Kent County during 2019, 19 (18.4%) were on the northwest side of Grand Rapids. Of those 6 (31.6%) failed.



Two compliance failures occurred in Lake County in 2019. Both were in the city of Baldwin. The map shows the location of Baldwin and other nearby towns like Irons, Luther, Chase, and Idlewild.



As noted earlier, there were no compliance check failures in Mason County in 2019. The map shows the location of Mason County and surrounding areas like Lake Michigan, Hamlin Lake, and Ludington.

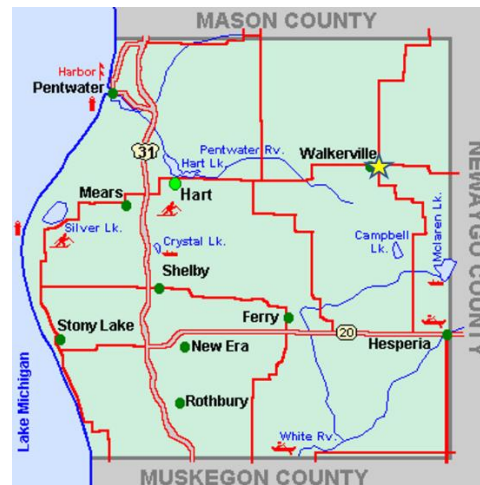


Tobacco Compliance Checks Longitudinal Analysis, 2012-2019

The map to the right displays the geographic distribution of tobacco sales compliance failures across Muskegon County in 2019. There was just one compliance failure in Muskegon County in 2019. This was the first compliance failure since 2015.



The map to the right displays the geographic distribution of tobacco sales compliance failures across Oceana County in 2019. There was just one compliance failure during 2019.



The map to the right displays the geographic distribution of tobacco sales compliance failures across Ottawa County in 2019. While all compliance failures occurred in either the Holland or Grand Haven areas, it should be noted that Holland and Grand Haven areas were the only portions of the county to receive compliance checks during the year.



Tobacco Compliance Checks Longitudinal Analysis, 2012-2019

The chart below displays information regarding the environmental conditions at the tobacco sales establishments that failed compliance checks in the LRE region in 2019 (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.

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, 2012-2019
ATTACHMENT A:

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%

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%

Tobacco Compliance Checks Longitudinal Analysis, 2012-2019

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%

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%

Tobacco Compliance Checks Longitudinal Analysis, 2012-2019

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, 2012-2019
ATTACHMENT B:

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%

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%

Tobacco Compliance Checks Longitudinal Analysis, 2012-2019

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%

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%

Tobacco Compliance Checks Longitudinal Analysis, 2012-2019

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%

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%

Tobacco Compliance Checks Longitudinal Analysis, 2012-2019

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%
	Muskegon	9		0.00%	100.00%	0.00%	33.33%	66.67%	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%
	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%