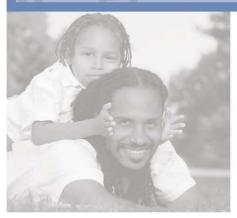




Introduction to Alcohol Compliance Checks and Responsible Beverage Service













SUBSTANCE ABUSE PREVENTION PROFESSIONAL DEVELOPMENT





For reprint permission contact the Communications Department in Prevention First's Chicago office at 800.572.5385



Prevention First is a nonprofit dedicated to preventing teen drug use before it starts. Since 1980, Prevention First has provided training, technical assistance and resource materials to thousands of schools, community groups, parents and youth.

We specialize in building the capacity of practitioners to develop strategic plans to address local substance abuse prevention needs, select and implement the best programs, curricula and strategies designed to promote social and emotional health and prevent substance abuse, and develop and implement media and communication campaigns designed to educate the public.

Prevention First is primarily funded by the Illinois Department of Human Services. Additional funding is provided by the Illinois Department of Corrections, Illinois Department of Transportation, and through private foundations and individual donations.

Our Vision

Healthy communities that encourage drug-free youth.

Our Mission

To build community capacity to prevent substance abuse by providing training and technical assistance and raising public awareness.



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Training Overview

Description

This on-line training provides participants with an overview of alcohol compliance checks and Responsible Beverage Service (RBS). Participants will learn about the SAPP Standards. This training is intended for prevention specialists and coalition members to gain a better understanding of this strategy, and is not intended to train law enforcement officials to implement compliance checks.

Learning Objectives

Upon completion of this course, participants will be able to:

- describe the intent, effectiveness, benefits and key components of compliance checks.
- identify important steps involved in planning compliance check operations as identified by the SAPP Standards for Compliance Checks (including Responsible Beverage Service), and
- identify important components of strategy implementation/enforcement.

Outline of Course Contents

Module One: Overview Module Two: Planning

Module Three: Implementation

Module Four: Responsible Beverage Service

Audience

IDHS SAPP and PFS Providers implementing this strategy.

Completion Time

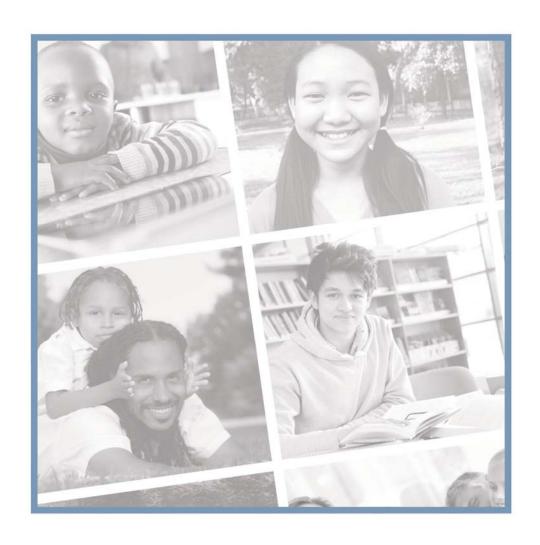
Estimated completion time is 1.5 to 2 hours.

Testing

Participants will complete a post-test on material learned in this course. Participants must pass the post-test with 80 percent accuracy in order to obtain credit for the course.

Module One: F

Overview



Youth Retail Access to Alcohol

Young people who drink alcohol obtain it from a variety of sources, such as friends, parents, parties and retail outlets. According to the 2014 Illinois Youth Survey, 13% of 12^{th} graders who reported using alcohol within the past year reported obtaining it from at least one retail source (including store, gas station, or bar/restaurant).

When it comes to finding a retail outlet where the clerks or employees are lax in checking ID...kids know who they are. It doesn't take long for well-developed lines of communication to buzz about a retailer who doesn't carefully check ID's. Alcohol compliance checks are a prevention strategy to reduce retail alcohol sales to minors.

2014 Illinois Youth Survey

Sources of Alcohol Access	Among Alcohol Users in the Past Year		
	8th	10th	12th
Retail Purchase			
AT LEAST ONE retail source	5.1%	7.5%	12.9%
Bought it at a store or gas station	3.6%	6.0%	9.9%
Bought it at a bar or restaurant	2.2%	3.3%	6.8%
Use of Fake ID			
Purchased using a fake ID	N/A	0.7%	1.3%

Source: Illinois Youth Survey 2014 State Report(3)

Compliance Checks

Introduction

Compliance checks, an environmental prevention strategy, deter and prevent retail alcohol outlets from selling alcohol to underage youth. They are conducted by law enforcement and involve the use of undercover underage buyers to test retailers' compliance with state laws and/or local ordinances that regulate the sale of alcohol.

Compliance checks demonstrate to retailers that the community is serious about reducing illegal sales and preventing underage drinking. While often referred to as "stings," the purpose is not to punish merchants, but rather to compel voluntary compliance with the law. Compliance checks help to deter, identify, warn, and educate establishments that sell to underage youth. They are thought to be most effective when they are frequent, well publicized, and well designed; solicit community support; and impose penalties on the licensed establishment rather than just the employee who sells to/serves the minor.

NOTE: This strategy must be implemented by law enforcement. Optimal methods include "conducting checks of all establishments, conducting 3 to 4 checks per year, conducting follow-up checks within 3 months, and penalizing the licensees (not only the server/clerk) for failing a compliance check)." Ideally, 100% of retailers who fail a check should be issued a citation.

Source: Erickson, D. J., Lenk, K. M., Sanem, J. R., Nelson, T. F., Jones-Webb, R., & Toomey, T. L. (2014). Current use of underage alcohol compliance checks by enforcement agencies in the United States. Alcoholism: Clinical & Experimental Research, 38(6), 1712-1719. doi:10.1111/acer.12397

Types

There are three categories of compliance checks:

- Educational: An initial "audit" or "survey" may be conducted with written warnings (instead of citations) issued to failing establishments. The data collected provides a baseline of compliance for future reference and provides an opportunity to educate retailers of their responsibility. Educational checks can be conducted with youthful appearing adults instead of minors if no citations are issued.
- Administrative: Administrative sanctions (i.e. fines; license suspension etc.) are issued to the retailer through the State's or community's regulatory policies for licenses.
- **Criminal:** Criminal sanctions allow individuals (server/seller) to be cited under local ordinances or state law for beverage service violations.

Sources: Wake Forest University School of Medicine⁽¹⁵⁾; Wisconsin Alcohol Policy Project⁽¹⁶⁾

Summary of Evidence

Even moderate increases in enforcement of underage drinking laws can significantly reduce sales to minors:

- In Champaign, Illinois, annual compliance increased from 78% in the initial year (1996) to 89% in 2001. The compliance rate has been sustained to over 90% annually from 2003 to 2013.
- In Flathead County Montana, a joint effort between six law enforcement agencies and local coalitions from July 2005 to June 2006 increased compliance to over 70%, achieving a 30% reduction in illegal alcohol sales to youth. Checks were performed monthly on over 200 businesses.
- In Concord, New Hampshire, a quarterly compliance checks operation from March 2002 February 2004 (coupled with increased penalties and a media campaign) resulted in a 64% reduction in retail alcohol sales to underage youths.

Sources: Friedlein; Bruyer⁽²⁾; Edwards⁽⁴⁾

Benefits

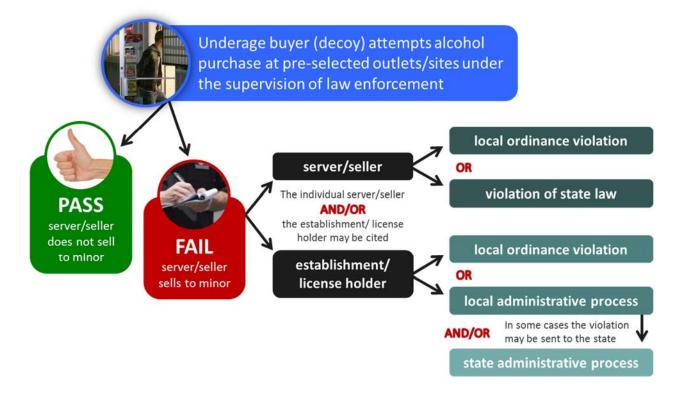
Reducing the source of supply through compliance checks is one of the most effective strategies available to reduce underage drinking, alcohol related problems and crime.

- Compliance checks provide a means to measure and monitor the level of underage alcohol sales in the community.
- Compliance checks have proven to be an effective approach to achieving voluntary compliance.
- Media exposure from compliance checks raises community awareness, reinforces community norms that underage drinking is unacceptable, and deters youth from attempting to purchase alcohol from retailers.
- Compliance checks are cost-effective; an investment of time and resources today will pay off in reduced economic and social costs later.

Source: Pacific Institute for Research and Evaluation⁽¹¹⁾

Process

When compliance checks are conducted, the establishment will either pass or fail the check. Law enforcement may cite the individual server/seller and/or the license holder/establishment for violations. The server or seller may be charged with a local ordinance violation, if one exists, or violation of Illinois state law. The establishment or license holder may be charged with a local ordinance violation if one exists or for violating local liquor license regulations. Local authorities may also send the violation to the Illinois Liquor Control Commission for violating state liquor license regulations. Compliance checks are thought to be more effective when penalties are imposed on the licensed establishment rather than just the employee who sells to/serves to a minor.



Key Allies

Key allies are those partners who are critical to the success of a compliance check operation. Without their support, the operation may not be effective or sustainable. Key allies include:

- **Law enforcement officials** must be on board if checks are to be conducted frequently and systematically according to best practices.
- The **local liquor control commissioner** usually the mayor or president of the board of trustees is charged with the administration of local liquor licenses and of alcohol-related ordinances and resolutions. They can authorize compliance checks and they grant, suspend and/or revoke local licenses. The local liquor control commissioner must be on board in order to set or change local policy and to apply administrative sanctions for license violations.
- **Judicial partners**, such as state and district attorneys, judges and prosecutors must be on board to carry out the consequences of violations of the law.
- **Merchants** are often overlooked as allies, but don't count them out. They can help educate and influence other businesses for the good of the community.
- Key **prevention partners**, such as MADD, SADD, public health, schools and universities, youth groups, and church groups, offer important political support when advocating for effective prevention strategies and educating the public.
- Strong support among community members can influence local officials and police to enforce underage drinking laws, lessen the chance that businesses will contest the program, strengthen community norms against underage drinking and promote voluntary compliance by retailers.

When initiating a compliance check operation, it's critical to build support among key allies. Take some time to assess readiness of key allies and find out where they stand on the issue, then work to build their support.

Media Advocacy

Media advocacy is the strategic use of media to advance a social or public policy goal and is a critical tool in building community support for compliance checks. Advocacy plays a role in educating the public, swaying public opinion and/or influencing policy-makers.

Community coalitions can use media advocacy to:

- educate the community about the consequences of underage drinking, local use rates among teens and the percentage of local youth who obtain alcohol from retail sources,
- promote the laws and consequences for selling alcohol to minors, and
- inform the public about how and why compliance checks are effective.

There are a variety of ways to get the issue in the public eye, including:

- press releases
- letters to the editor
- op-eds
- interviews
- press conferences
- paid advertisements
- social media

Sources: Bruyer⁽²⁾; Pacific Institute for Research and Evaluation⁽¹²⁾



Planning



SAPP Standards for Compliance Checks

(including Responsible Beverage Service)

Compliance Checks and RBS have been implemented in a way that demonstrates the following have been addressed:

- 1. The support of individuals/agencies responsible for leading enforcement efforts has been secured
- 2. The support of adjudicators/prosecutors has been secured
- 3. Enforcement efforts are targeted to locations and time of day/year based on data
- 4. Enforcement agencies have agreed to supply enforcement data with the coalition/provider as evidenced through a memorandum of understanding and/or subcontract
- 5. Law enforcement officer in charge has been trained /certified (or received a waiver) to conduct compliance checks by the Illinois Law Enforcement Training and Standards Board
- 6. Protocol includes a permission/acknowledgement form signed by youth which includes program expectations and requirements including a non-disclosure statement indicating they will not discuss the program with others
- 7. Protocol includes a signed parental release for volunteers under 18
- 8. Sanctions for violations have been administered
- 9. Retailers are notified at least once that compliance checks will be conducted and the consequences of being out of compliance or non-compliance with the law
- 10. Information about the compliance checks and enforcement effort results have been publicized within the community at least once per fiscal year
- 11. Beverage Alcohol Sellers and Servers Education and Training (BASSET) certified Responsible Beverage Service program is available
 - Retailers were notified of the BASSET certified training program options available
 - Provider has assessed how retailers prefer to have their staff trained in the BASSET certified program – online or face to face

Plan

As you prepare to implement Alcohol Compliance Checks, it is recommended that you develop a **Compliance Checks Plan** to meet each of the SAPP Standards. Each standard will be discussed in greater detail during this module.

Secure the Support of Law Enforcement

SAPP Standard:

1. The support of the individuals/agencies responsible for leading enforcement efforts has been secured

The Compliance Checks Plan should include the strategies the coalition will use to develop or maintain a positive working relationship with law enforcement. If law enforcement is resistant to or apathetic about implementing compliance checks, determine why and work to secure their support. Aim your efforts at the administrators or officers who are or would be in charge of supervising and implementing the checks.

- If law enforcement doesn't see the need for prevention or compliance checks, make the case for prevention by bringing attention to the problems associated with underage drinking and using data from your community that indicates youth are obtaining alcohol from retail sources.
- Sometimes law enforcement isn't aware that the community supports compliance checks and may be concerned about retailer objections to enforcement. In this case, generate and demonstrate the support that exists for the effort by linking law enforcement with key supporters, conducting community polls or conducting media advocacy.
- If law enforcement isn't sure the strategy will work, provide research shared earlier
 in this training that demonstrates its effectiveness as well as data and resources
 from other nearby police departments who are successfully implementing the
 strategy.
- If law enforcement doesn't believe they have the resources to implement compliance checks, offer to support some of the administrative aspects of the operation.

Collaboration

A strong partnership between law enforcement and a prevention coalition can increase the likelihood of a successful compliance check program and sustainability over time. The coalition participates in an effective evidence-based intervention and the law enforcement agency is able to implement compliance checks without draining local resources.

While compliance checks must be conducted by law enforcement, coalitions can work with law enforcement partners to:

- ensure best practices/SAPP standards are met
- coordinate training,
- locate and provide financial resources,
- build community support, and
- conduct merchant education.

SAPP providers and community coalitions should develop a Memorandum of Understanding with law enforcement partners that documents the agreement and clarifies roles and responsibilities.

MOU/Sub-Contract

A Memorandum of Understanding (MOU) is a document describing an agreement between two or more parties. Each MOU should include the following:

- Names of both parties and length/date of agreement
- Description of the scope of services, including timelines and compensation
- Roles and responsibilities of both parties
- Signature and date of each party

MOU (SAMPLE)

This Memorandum of Understanding (MOU) is entered into between Anytown Police Department and ABC Coalition, for services from July 1, 2013 – June 30, 2014 as follows:

Anytown Police Department agency will conduct 4 rounds of compliance checks by no later than June 30, 2014. Compliance checks should occur on a quarterly basis, or every 3 months, throughout the county. During the term of this agreement, as long as funding is available, ABC coalition agrees to pay Anytown Police Department \$4,000.00 for 4 rounds of compliance checks, including funds for youth stipends.

ABC Law Enforcement Agency agrees to:

- Notify the Strategic Prevention Framework Project Coordinator, at least 2 weeks prior to compliance check details occurring.
- Provide the results of the compliance checks to the Strategic Prevention Framework Project Coordinator within 2 weeks after the compliance checks are completed, including:
 - Dates of performed compliance checks
 - Names of establishments checked
 - Status of checks (pass or fail)
 - Number of citations or notice to appear issued
- ABC Law Enforcement Agency agrees to adhere to all of the SAPP Standards for Compliance Checks (see attached).

ABC Coalition agrees to:

- Inform retailers of their responsibility to not serve alcohol to minors (within 3 weeks prior to upcoming compliance checks)
- Promote awareness of the policy/consequence of serving alcohol to minors
- Develop and distribute press releases announcing results of compliance checks
- Recruit and coordinate training for underage youth volunteers.
- Provide opportunities for Responsible Beverage Server Training to retailers

Authorized Representative, ABC Coalition	Date
Authorized Representative, Anytown Police Department	Date

Secure the Support of Adjudicators/Prosecutors

SAPP Standard:

2. The support of adjudicators/prosecutors has been secured

The Compliance Checks Plan should address how judicial partners will be informed of the operation and include strategies to garner and maintain their support.

- Educate judicial partners about local underage drinking problems and the goals and
 effectiveness of the strategy to help build support and prevent dismissals or lack of
 administrative follow-through and prosecution.
- State statutes require that local compliance check programs be approved by the
 governing body. The local liquor control commissioner, normally the city mayor or
 village president, is instrumental in local policy development and is mandated under
 Illinois Public Act to establish policy and standards for alcohol compliance
 operations.
- Legal advice should be sought from the state's attorney and/or the local legal counsel. In jurisdictions where state statutes will be utilized the guidelines should be reconciled with the county state's attorney. Where a local ordinance is used, the city or village corporation counsel should be consulted.
- Operations greatly impact the regulatory and criminal justice system. Sharing the plan with regulators, courts and prosecutors allows them to establish systems and prepare to deal with the additional charges generated by the enforcement campaign.

Source: Pacific Institute for Research and Evaluation(10)

Target Enforcement Efforts

SAPP Standard:

3. Enforcement efforts are targeted to locations and time of day/year based on data (e.g. citizen complaints, law enforcement information, school events such as prom and spring break, etc.)

Law enforcement agencies should utilize a systematic approach to selecting locations and times for investigations, with the ultimate goal being visitation of all publicly accessible licensed outlets on an annualized schedule that ensures random visitations during quarterly periods of activity.

Optimal methods include conducting checks of all establishments, conducting 3 to 4 checks per year, and conducting follow-up checks within 3 months.

While the most comprehensive program would involve all retail alcohol outlets, it is not always practical with limited resources. Establish a protocol defining which businesses will be checked so that all licensees have an equal likelihood of being checked and to counter claims that a particular business or type of retailer (e.g. off-premise convenience stores) is being unfairly targeted.

Approaches to selecting sites, include:

- 1. **All Outlets.** Lists of alcohol licensees in your jurisdiction can usually be obtained from the local licensing authority (clerk of the city or town council); Illinois Liquor Control Commission or state alcohol tax agency.
- 2. **Random Selection.** Obtain a complete list of licensees; select and check sites randomly (e.g., every tenth outlet).
- 3. **Region.** If resources are limited, select one region of the jurisdiction and check all licensees within that area.
- 4. **License Type.** Select businesses by license type (e.g., liquor store, convenience store, gas station, grocery store, restaurant, bar, etc.) and rotate among types.

Conducting retail compliance investigations on an on-going basis throughout the year is the most effective manner of maintaining a presence in the community. The more frequent the compliance checks, the greater the perceived deterrent threat to businesses, increasing the likelihood of long-term compliance. An alternative to conducting continuing retail

Introduction to Alcohol Compliance Checks and Responsible Beverage Service

compliance investigations is to schedule them in waves periodically throughout the year. Conducting investigations over a two-week period, three to four times per year, will keep the issue fresh in the minds of beverage retailers and assist in achieving voluntary compliance. Whenever possible, conduct future operations at sites not initially targeted until all licensees in the jurisdiction have been checked (except for repeat visits to those that failed the first check).

Investigations should be conducted at the same time young people would normally be attempting to make alcohol purchases. Underage alcohol purchases tend to be earlier in the evening than those by of-age adults and are often made in conjunction with social events such as basketball and football games, concerts, and dances. Friday and Saturday nights are also prime purchase times. Some law enforcement agencies chose to limit age compliance checks to high risk occasions such as homecoming, prom and graduation, however, time targeted checks are unlikely to deter retailers the rest of the year.

Protocol should be established for re-checking sites that have failed as well as checking problem sites that have been reported as the source of alcohol in alcohol-related crimes (from arrest/investigation reports) and sites for which the department has received complaints. Re-checks should occur after a meeting with management / ownership to emphasize their responsibilities as license-holders and provide resources for staff training. It is recommended that establishments who fail an initial check undergo two additional checks within the calendar, the first being within 3 months of the initial failed check.

Sources: Illinois Law Enforcement Training and Standards Board⁽⁷⁾; Pacific Institute for Research and Evaluation⁽¹¹⁾; Wisconsin Alcohol Policy Project⁽¹⁶⁾

Share Enforcement Data

SAPP Standard:

4. Enforcement agencies have agreed to supply enforcement data with the coalition/provider as evidenced through a memorandum of understanding and/or subcontract

SAPP/PFS providers/coalitions who are sponsoring and/or working with law enforcement to conduct alcohol compliance checks are required to obtain the results from all compliance checks conducted. A process/system for documenting and sharing information should be developed prior to the start of the compliance checks. The agreement and methods for sharing information should be documented in the Memorandum of Understanding.

SAPP/PFS providers are required to report the following outputs:

Compliance Checks

- 1. Total number of alcohol retailers
- 2. Total number of compliance check operations (may occur over a multi-day period)
- 3. Number of retailers checked only once in fiscal year
- 4. Number of retailers checked more than once in fiscal year
- 5. Number of retailers that failed at least one compliance check in the fiscal year
- 6. Number of retailers who received citations for failing checks
- 7. Percent of retailers checked: total checked (output 3 + 4) divided by total number of retailers (output 1)
- 8. Retailer Compliance Rate: 100% total retailers that failed (output 5) divided by total retailers checked (output 3 + 4)*100

Responsible Beverage Service (classroom-based training only)

- 1. Number of classroom-based RBS trainings held during the fiscal year
- 2. Number of participants at each RBS training held during fiscal year
- 3. Number of alcohol retailers that attended the classroom-based RBS training during the fiscal year

Officer Training & Certification

SAPP Standard:

5. Law enforcement officer in charge has been trained /certified (or received a waiver) to conduct compliance checks by the Illinois Law Enforcement Training and Standards Board

Illinois Public Act 92-0503 requires individuals assigned to supervise compliance checks be trained in a course approved by the Illinois Law Enforcement Training and Standards Board (ILETSB). This means that at minimum, one law enforcement official must be trained to oversee the program. The supervising officer is responsible for ensuring the guidelines are followed and that enforcement staff know what to do, but does not necessarily have to conduct or accompany staff on every check.

State and Local Requirements (laws, ordinances, policies)

Enforcement efforts must adhere to state and local requirements. Legal advice should be sought from the state's attorney and/or the local legal counsel with respect to the conduct and pattern of local compliance checks, evidence handling, arrests, requirements for avoiding entrapment (what the decoy is and/or is not allowed to say or do), agent/decoy criteria and reporting prior to initiating the operation. This will help avoid pitfalls and help ensure that everyone is on the same page.

The Illinois Law Enforcement Training and Standards Board (ILETSB) has developed Model Policy and Guidelines for Alcohol and Tobacco Compliance Checks by Law Enforcement Officers. The publication is designed to assist law enforcement agencies in meeting the mandates of Public Act 92-0503 (The Act). It includes sample operational orders, checklists, forms and departmental policy. The policy and guidelines provide an essential starting point for initiating compliance checks in Illinois, and can be adopted and modified by local communities as necessary and allowed for. The Model Policy and Guidelines can be downloaded from the ILETSB website at

https://www.iletsbei.com/docs/publications/alcohol.pdf.

Source: Illinois Law Enforcement Training and Standards Board⁽⁷⁾

Volunteer Permission/Acknowledgement

SAPP Standard:

6. Protocol includes a permission/acknowledgement form signed by youth which includes program expectations and requirements including a non-disclosure statement indicating they will not discuss the program with others

All volunteers should sign a permission/acknowledgement form which includes program expectations and requirements and a non-disclosure statement indicating they will not discuss the program with others. It should describe the tasks to be performed and the limits on the volunteer's authority and immunity. This document is intended to protect both the agency and the volunteer.

Signed Parental Release

SAPP Standard:

7. Protocol includes a signed parental release for volunteers under 18

While ideally volunteer buyers will be 18 or 19 years old, Parental Consent Forms must be utilized for minor volunteers under the age of 18.

Identify Sanctions

SAPP Standard:

8. Sanctions for violations have been administered

The Compliance Checks Plan should identify sanctions that will be applied for violations of the law. Sanctions should swift, certain and of appropriate severity to the violation.

Law enforcement agencies have options regarding the laws they use in their operation - they may cite the server/seller with a state or local law violation and/or the license holder with a local ordinance violation and/or local license violation which may also be sent to the Illinois Liquor Control Commission.

Illinois Penalties

In Illinois, criminal sanctions can be imposed on licensees and individuals for selling or distributing alcoholic beverages to individuals under 21 years of age. Potential fines range from a minimum of \$500 to a maximum of \$2,500 and could include a jail sentence of up to one year. Liquor licenses can also be fined, suspended or revoked.

Local Sanctions

Local ordinances and administrative processes should clearly state the fines/penalties for violations, to ensure transparency and fairness. Local ordinances/administrative processes allow for greater flexibility to apply creative sanctions and/or progressive fines than if state law is used. Prior to initiating the operation, communities should review their local ordinances and talk with the local liquor control commissioner to ensure that the resulting penalties and sanctions will have the desired deterrent effect. The community may decide to advocate for an ordinance/policy adoption or change if the existing sanctions are not of appropriate severity.

Types of Sanctions

Progressive fines are graduated for first, second, and subsequent offenses. For example, in Champaign Illinois, an initial violation in a calendar year is a \$500 fine, a second violation is a \$1000 fine, and a third and subsequent violations incur a license suspension.

Creative sanctions might impose penalties other than fines and further encourage voluntary compliance. In Champaign, local policies allow the initial \$500 fine to be waived if the licensee has had no violations over the last two years, has 75% of the staff trained in Responsible Beverage Service (RBS), or had voluntarily participated in Cops in Shops enforcement at least three times within the last year.

Progressive fines & creative sanctions have several benefits:

- Licensing authorities may be more likely to apply penalties to first-time offenders if sanctions are graduated and the first penalty is not overly severs
- Business owners may be less likely to contest charges
- The community may see specific graduated consequences as being fairer to the businesses

Local policies should also address when sanctions are to be applied so that they are administered fairly. For example, if the penalty includes a period of license suspension then a policy may state that the suspension must be served on the same day of the week and under similar conditions occurring at the time of the violation.

Sources: Alcohol Epidemiology Program⁽¹⁾; Wake Forest University School of Medicine⁽¹⁵⁾; Wisconsin Alcohol Policy Project⁽¹⁶⁾

Inform Retailers

SAPP Standard:

9. Retailers are notified at least once that compliance checks will be conducted and the consequences of being out of compliance or non-compliance with the law

A critical component of compliance checks is informing retailers of upcoming enforcement. Notification should be clear and direct, such as letters or in-person visits to each retailer.

- Inform retailers that compliance checks will occur, but not when they will occur.
- Educate them about their responsibility and potential consequences of sales to minors.
- Provide additional support by making BASSET training available.

Keep in mind that the goal is to prevent alcohol sales to minors, not to amass violations. Informing licensees that enforcement is upcoming and ongoing can:

- increase awareness of underage drinking problems,
- deter retailers from selling to minors,
- improve case outcomes since judges and licensing authorities may be more likely to sanction violators that have received education and warnings, and
- increase support from the business community by instituting a fair process, advance notice and educational support.

Source: Wake Forest University School of Medicine⁽¹⁵⁾

Publicize Results

SAPP Standard:

10. Information about the compliance checks and enforcement effort results have been publicized within the community – at least once per fiscal year

The Compliance Checks Plan should include strategies for getting the media on board and outline the system to be used for collecting and reporting data. While planning the compliance check operation, it is important to develop relationships with the media and learn their protocols. Establishing a relationship and generating interest and support for the issue in advance of the operation will increase the likelihood of getting media coverage when it's needed. Prior to the operation, develop a current contact list that includes contract information for each relevant local media outlet. Introduce yourself to reporters, editors and others that are most likely to cover your issue. Provide information that will make your contacts want to stay on top of the issue and let them know you can be reached for comment on the issue when needed.

In order to publicize results, the coalition/department will need to have a system in place to collect and track data regarding each wave of checks. The names of establishments willing to sell alcohol, as well as those that refused sale to the underage decoy(s) in each wave should be publicized to the community through media.

Sources: Bruyer⁽²⁾; Pacific Institute for Research and Evaluation^(10,11); Wisconsin Alcohol Policy Project⁽¹⁶⁾

Provide BASSET Training

SAPP Standard:

- 11. Beverage Alcohol Sellers and Servers Education and Training (BASSET) certified Responsible Beverage Service program is available
 - Retailers were notified of the BASSET certified training program options available
 - Provider has assessed how retailers prefer to have their staff trained in the BASSET certified program – online or face to face

Within the SAPP system, compliance checks must be paired with Responsible Beverage Service. Responsible beverage server trainings provide education opportunities to owners, managers, servers, and sellers at alcohol establishments on how to avoid illegally selling alcohol to underage youth. The Beverage Alcohol Sellers and Servers Education and Training (BASSET) program is the State of Illinois' seller/server training program. The Compliance Checks Plan should outline how and when the BASSET program will be offered.

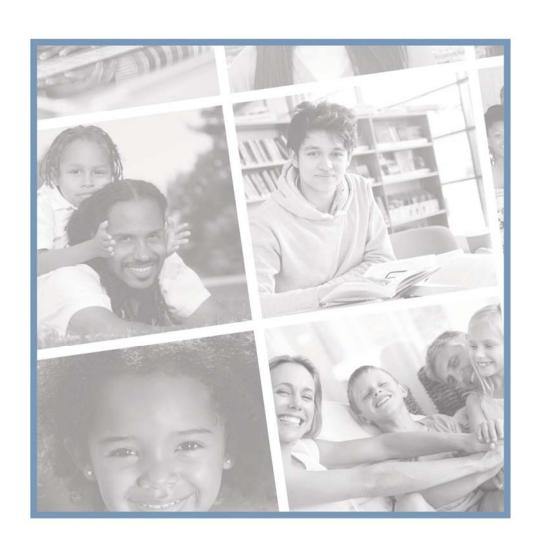
Compliance Checks Plan Template

	Description/Checklist
1. Describe how the coalition has or will secure the support of law enforcement (attach MOU).	
2. Describe how the coalition has or will secure the support of adjudicators/ prosecutors.	
3. Describe the process for scheduling enforcement to ensure effort are targeted to locations and time of day/year based on data.	
4. Describe the process and guidelines for the provider/coalition to obtain enforcement data from law enforcement (attach MOU).	
5. Verify law enforcement officer in charge has been trained /certified (or received a waiver) to conduct compliance checks by the Illinois Law Enforcement Training and Standards Board.	

	Description/Checklist
6. Ensure protocol includes a permission/ acknowledgement form signed by youth which includes program expectations and requirements including a non-disclosure statement indicating they will not discuss the program with others.	
7. Ensure protocol includes a process for obtaining signed parental release for volunteers under 18.	
8. Describe the sanctions that will be applied for violations.	
9. Develop/describe a process for notifying retailers at least once that compliance checks will be conducted and the consequences of being out of compliance or non-compliance with the law.	
10. Describe the methods and processes for publicizing results.	
11. Describe process for assessing retailer preference of BASSET training type; describe the schedule and retailer notification process for providing BASSET.	



Implementation



Implementation Overview

Implementing compliance checks is the role of law enforcement. As you work with law enforcement on implementing compliance checks, you should be knowledgeable about the strategy. Below are the major components of compliance checks that are included in this module.

Underage Buyers

A critical component of the operation is identifying the volunteer underage buyers who will participate in the detail. Selection and use of the volunteers should present a reasonable test of the retailer's practices and inclination to sell, yet be above suspicion of trickery or entrapment.

Training

Training provides underage volunteers with the knowledge and skills necessary to conduct the compliance checks with confidence. During the formal training process, volunteers should be provided with information about what to wear, what to say, and how to act.

Procedures

The law enforcement agency will need to develop procedures to ensure smooth implementation of the operations. They will need to determine whether volunteers are going to carry their own identification; identify the evidence needed for the operation; develop procedures for the transaction; and determine when and how citations will be issued.

Documentation

Law enforcement will need to maintain a detailed log of all investigations and document all violations with a police report. Law enforcement will also need to gather evidence to support each citation.

Follow-Up with Retailers

Law enforcement will need to notify establishments after the checks are conducted that the checks occurred and the outcome of the checks.

Underage Buyers

Underage volunteers (buyers/decoys) are the backbone of a successful retailer compliance investigation program. Selection and use of the volunteers should present a reasonable test of the retailer's practices and inclination to sell, yet be above suspicion of trickery or entrapment.

Recruitment

In recruiting underage volunteers, you might explore:

- Family members of coalition members and/or officers
- Faith-based organizations
- Youth groups/members of school-based peer leader programs
- Police cadets or interns
- Criminal justice students
- Referrals from youth already involved in program
- Newspaper ads

No matter how the volunteer is recruited or who he or she is referred by, all underage buyers must be subjected to the same protocols, background checks and age verification testing.

Multiple Buyers

Having two decoys work together, whether they enter each site together or alternate purchase attempts at sites, can be beneficial. Multiple buyers can support each other, and may seem more common/natural to an outlet's employees. Also, employing multiple/different buyers at each site may offset the effects of "phone trees" where businesses call other establishments to warn them that compliance checks are being done. Whether one or more decoys are employed, it is best not to have an underage buyer partner with the plain clothes officer in order to avoid charges of entrapment. If the buyer is with an adult, it may appear to the seller as if the buyer is purchasing with a parent. Additionally, if two decoys are used at one site, only one should be instructed to make the purchase attempt.

Buyer Age

When conducting compliance checks, the young person attempting to purchase alcohol (the buyer) must be underage. The buyer should be under 20 and ideally should be 18 or 19 years of age. If the buyer is not actually underage, no law would be violated when an establishment sells to the buyer. The appearance of the buyer should present a reasonable test of the server/seller - not appear so young as to obviously be under 21, but also not appear the age of 21 to objective observers. Additionally, buyers should not be too close to the age of 21 so as to ensure that they are still a minor when and if they have to provide testimony.

Buyer Appearance

Appearance of the volunteer is a major consideration in defending the investigations against charges of trickery or entrapment. The decoys should look and act their actual age and should not alter/enhance their appearance through cosmetics, different hairstyles, or clothing that they would not usually wear. Males should not have facial hair and females should not wear heavy makeup. Ball caps and sunglasses which may hide portions of the face or disguise the volunteer should not be permitted. Revealing or suggestive clothing should never be worn by the volunteer. The volunteers should blend into the community where they will be attempting sales. Both male and female youth should be used in the operation.

Buyer Character

Decoys should be of good character. They should not have criminal records. You will want to avoid any perception that the youth are compelled to entice sales in return for lesser sanctions or personal benefit. This pitfall can lead to issues in court and result in the dismissal of enforcement activities.

Written Statements

All volunteers should be fully informed of the nature of their role within the operation and be willing and able to fulfill all functions required of them. Underage volunteers will be required to complete a form or write a statement which documents each compliance check in which they are involved. This statement should be completed by the underage volunteer immediately following check. This statement is particularly important when a sale is made, and will include such information as who sold to the minor, dates and times, circumstances, etc. The statement becomes part of the official case report and may be critical during subsequent administrative or criminal proceedings.

Court Testimony

All volunteers must be available and willing to attend any subsequent court proceedings and/or administrative hearings that may result from their involvement in the compliance check operations, if needed.

Age-appearance Validation

The most common defense offered by retailers who fail compliance checks is that the buyer looked to be over 21 and so they did not ask for identification. An age verification process will obtain an objective assessment of the age of each volunteer from a sample of adults. Age verification involves random public polling (in a high traffic area such as a mall or park) or an age assessment panel (comprised of responsible adults with diverse backgrounds) to estimate the age of the (in-person) volunteer. The age verification process should obtain the opinions of at least ten adults. Volunteers whose age-appearance is between 18 and 20 years of age should be accepted into the program, while those who test too young or appear to be 21 or over by most in the sample should not be accepted into the program.

It is important that the process is well documented, including the potential volunteer's name, their actual age at the time of assessment, the process/location of assessment, a photograph of the volunteer at the time of assessment, and the age estimations acquired.

Documentation

A file should be established on each volunteer that verifies that he/she meets the established criteria. The file should contain:

- Photographs (from each detail)
- Copy of driver's license, state-issued ID card, or birth certificate.
- Background check results
- Acknowledgement form
- Parental Consent form, if under age 18
- Age Verification results
- Record of details conducted and pass/fail rates*

*It is recommended that a volunteer not be used if he or she has a consistently high buy rate. It is important to ensure that a volunteer's appearance or demeanor is not consistently causing the retail employees to believe that a volunteer is over 21.

Sources: Illinois Law Enforcement Training and Standards Board $^{(7)}$; Pacific Institute for Research and Evaluation $^{(10;\,11)}$; Prevention First $^{(13)}$; Wake Forest University School of Medicine $^{(15)}$

Volunteer Training

Training provides underage volunteers with the knowledge and skills necessary to conduct the compliance checks with confidence. During the formal training process, volunteers should be provided with information about what to wear, what to say, and how to act. Every attempt is made to limit the volunteer's discretion and ensure that the process is accomplished in a safe and expeditious manner.

Court Processes

If criminal complaints or administrative sanctions will be sought, explain the criminal court and licensing sanction processes. Ensure that the buyer understands that they may be called upon to be a witness and may have to testify in public before a judge, jury, or city council regarding the particular details of a compliance check.

Protocol

A walk through of protocols and expectations will prepare youth for a successful buy attempt. During training, volunteers should be provided with clear guidance on exactly how to attempt the sale. The use of a role-play scenario is a great way to build confidence and reduce nervousness. Setting the stage and putting all players through the steps of a compliance check will ensure that everyone is on the same page before entering the retail environment.

A checklist or list of "do's" and "don'ts" can also help prepare volunteers for the check. For example, volunteers should be advised not to loiter in the establishment, not to engage in any unnecessary conversation with the clerk or patrons, to discontinue the check and leave the store if they recognize the clerk or a patron, and to answer any questions posed by the clerk truthfully. To avoid allegations of entrapment, the volunteer should never say or do anything to entice the clerk to sell them alcohol.

Appearance

It is important that underage volunteers do nothing to enhance their appearance during compliance checks. They should not dress in a manner that confuses or tricks retailers. Buyers should be instructed to wear clothing that is age appropriate and that fits the geographic area. Buyers should not wear dated clothing or items signifying a college, fraternity/sorority, etc. Gentlemen should shave before reporting to work and should not wear a ball cap or sunglasses. Ladies should not wear excessive make-up, jewelry, or revealing clothing.

Safety

While most compliance checks are completed in a very short amount of time and without incident, potential situations that might make a volunteer uncomfortable or unsafe - and what they should do as a result - should be discussed during training. Volunteers should be given the authority to leave the establishment and go straight to the backup officer if they feel unsafe or uncomfortable for any reason.

Purchase

It is important that the volunteer know exactly what they are looking for, and preferably where it can be found, before entering the premises. The product of choice should be age appropriate; something that local youth would normally purchase without raising suspicion. Beer is generally recognized as the drink of choice among young people. Typical young drinkers select common and less expensive brands of beer. Additionally, the alcohol purchased is evidence; canned/bottled products help confirm alcohol content and likely won't require lab testing. Instruction to decoys should include what brand name and size to purchase, and should be consistent from store to store so that the buyer is decisive in his/her actions.

Post-Attempt

Whether the purchase is successful or denied, the volunteer should leave the premise immediately and meet at a previously determined location to brief law enforcement and relinquish any alcohol purchased and remaining monies.

Sources: Pacific Institute for Research and Evaluation^(10,11)

Procedures

Identification

The law enforcement agency should decide ahead of time if volunteers are going to carry their own identification. It is recommended that they carry ID and present it when asked. While there is a risk of temporarily identifying the buyer; this procedure provides a more realistic test. Many times retail clerks simply ask for ID as part of a routine and do not actually examine it to determine if it is altered, current, or even belongs to the presenter. The use of a proper ID also tests the clerk's ability to accurately check the date of birth on the ID. If the volunteers do not carry identification and they are asked for it, the volunteers should state that they do not have ID. Some clerks will still sell to them.

Source: Pacific Institute for Research and Evaluation⁽¹¹⁾

Evidence

Cash will be needed for the purchase attempts (SAPP funds cannot be used to purchase alcohol). Some departments document and track serial numbers of bills for evidence so they can get the money back. Your court may be able to set up a fund from fines that could be used for "buy" money.

A photograph should be taken of the underage buyer(s) who will be used in the investigation and put it on file.

Determine whether electronic monitoring will be used in the operation; obtain equipment if necessary (Illinois is a two party consent state, thus audio recording is not permitted, however, the transaction may be videotaped without audio).

Transaction

The agency vehicle should be parked in a manner so as not to tip off the clerk. Preferably, a plain clothes officer should enter the establishment first for safety purposes, but not enter so close to the volunteer as to make it appear they are together. The officer should be in a position to observe the transaction and serve as a witness to the violation. The officer may appear to be looking for a product or may select an item and wait in line behind the volunteer. The volunteer should enter the establishment and quickly attempt the purchase. Another officer should be positioned outside to watch for potential problems and threats, and to support the officer and volunteer inside the store. Once the volunteer has completed the transaction, he or she should leave the store and proceed directly to the vehicle to be debriefed. The written statement should be completed while the facts are still fresh.

Sources: Alcohol Epidemiology Program⁽¹⁾; Bruyer⁽²⁾; Illinois Higher Education Center⁽⁶⁾; Pacific Institute for Research and Evaluation⁽¹¹⁾

Citations

Law enforcement will need to determine when and how citations will be issued.

In an **immediate post-buy contact**, the officer approaches the seller/server and explains the compliance check. If no sale was made, the server/seller is congratulated; if a sale was made, the officer issues the citation on the spot. One problem with immediate contact is that many businesses will call neighboring retail outlets to warn them that enforcement is occurring. Therefore, some agencies avoid immediate contact with the seller or business, and instead use delayed post-buy contact.

In a **delayed post-buy contact**, compliance checks are conducted at several establishments without any law enforcement contact with the sellers or the businesses. The officer fully documents the sale with sufficient detail to ensure identification of the individual seller when contact is made at a later time. After all business selected for that wave of inspections have been checked officers return to complete enforcement activities.

Sources: Bruyer⁽²⁾; Wake Forest University School of Medicine⁽¹⁵⁾

Investigation Documentation

Law enforcement will need to maintain a detailed log of all investigations and document all violations with a police report. The log might include:

- the name of the establishment,
- the date and time of the check,
- identification of the server/seller (i.e. name, description, actions), and
- results of the attempt.

If a violation occurs, a police report will be created that might contain:

- a statement by the minor of their participation in the case,
- any statements made by the offending employee(s), and
- evidence/evidence chain.

The lead or supervising officer of the operation should ensure that citations and reports are forwarded to the appropriate authority.

Sources: Illinois Higher Education Center⁽⁶⁾; Pacific Institute for Research and Evaluation⁽¹¹⁾

Follow-Up with Retailers

State law requires that any licensee subjected to a compliance check, whether they pass or fail, must be notified in writing within 60 days of the actual check. Once law enforcement issues citations, it is up to the court system to follow-through. If you have built the support of the judicial system, as discussed earlier in the training, then the appropriate penalties and sanctions should be applied. SAPP Providers are required to report the number of sanctions/consequences administered, and follow-up with the court system as necessary to obtain this information.

Sample letters from the City of Champaign Police Department have been included on the following pages. Additional samples can be found at: http://www.udetc.org/commcoaltools.htm.

Pass

Licensees that refused to sell to decoys should receive notification and recognition for their successful training and screening procedures. In addition to congratulatory letters, the community might provide certificates or organize media events or banquets to recognize licensees that pass compliance checks. Businesses that pass checks should receive positive feedback about the efforts they took to ensure staff was compliant with the laws and be encouraged to recognize and reward the employee who was involved in the check.

Fail

Notification and education to licensees that fail a check should include data on the overall outcome and consequences of failure, encourage better practices, communication and training among staff, and provide education on the problems and consequences associated with underage drinking.

Source: Bruyer(2)

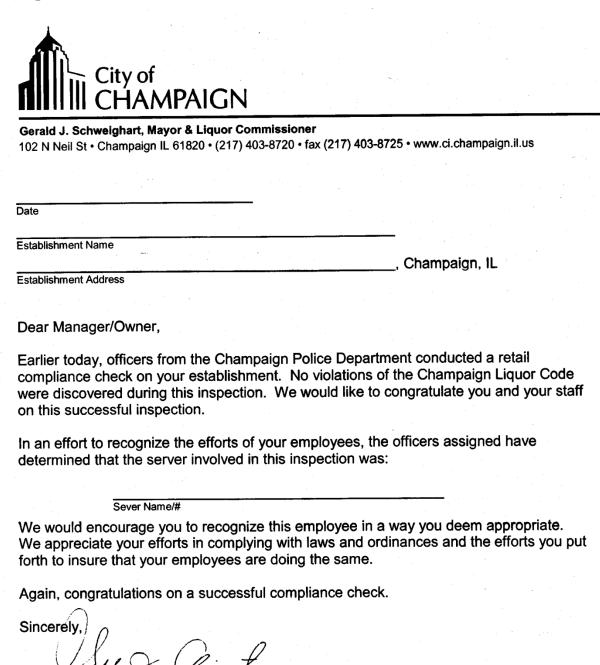
Sample Pass Letter

Gerald J. Schweighart

Notice was served to ____

cc: Licensee File

Mayor and Liquor Commissioner



Sample Fail Letter

City of CHAMPAIGN	
Gerald J. Schweighart, Mayor & Liquor Commissioner 102 N Neil St • Champaign IL 61820 • (217) 403-8720 • fax (217) 403-8725 • www.ci.champaign.il.us	
Date	
Establishment Name	— , Champaign, IL
Establishment Address	
Dear Manager/Owner,	
Earlier today, officers from the Champaign Police Department conducted a retail compliance check on your establishment. This check resulted in a failure. The below named employee committed a violation of the Champaign Liquor Code.	
Sever Name/#	
The City of Champaign is very concerned about youth accessibility to alcohol and has implemented a number of programs to reduce this likelihood. One of those programs is the TIPS Server Training Program. This program focuses on proper serving techniques. It is offered on a monthly basis with class sizes limited to 35 participants. I would encourage you to participate in this training program. The cost for this training is \$30.00 per person. To schedule individuals for the training you may contact Champaign Police Department at (217) 403-6920 or register online at the City of Champaign's website: www.ci.champaign.il.us .	
With this violation, your establishment may face a fine and/or suspension. The City of Champaign Legal Department will be sending you a Notice of Violation and Stipulation within the next couple of weeks. Upon receipt of this notice you will be given 14 days to respond. The Legal Department will be available to respond to any questions you may have. Feel free to contact them at (217) 403-8765.	
It is the city's goal to maintain the highest level of compliance possible. If there is anything we can do to assist you in helping us reach that goal please feel free to contact us.	
Sincerely, Lul Like H	
Gerald J. Schweighart Mayor and Liquor Commissioner	
cc: Licensee File Notice was served to	

Publicize Results

Publicizing results can foster voluntary compliance of retailers by making it clear that the laws are being enforced. Establishments which have not been tested may be more vigilant because they fear failing, and licensees who have failed and whose names are made public may be spurred to be more careful because they do not want to face additional penalties or negative public opinion. Increased media attention can also help raise community awareness of the problems stemming from underage drinking, strengthen community norms and reassure the public that retailers are held accountable for their behavior.

Some communities/departments might wish to publicize the resulting convictions/fines/sanctions in addition to or instead of the initial failure and compliance rates. Information should be provided to the media as quickly as possible - news becomes stale very quickly and a delay in providing results may mean the inability to obtain media coverage.



Responsible Beverage Service



Responsible Beverage Service Training

First off, let's clarify some terms. You may have heard the terms Responsible Beverage Service, RBS, Merchant Training, Server/Seller Training or BASSET. These are all terms for basically the same thing – a training that educates people who sell or serve alcohol to serve responsibly and within the law. While most of these terms are general and used interchangeably, BASSET is the State of Illinois' server/seller training program. BASSET was originally created to set the standards that responsible beverage service training programs had to meet to become certified in the State of Illinois. Over the years, BASSET has become a training program in and of itself - a few outside entities have packaged materials and offer training to certify individuals to implement BASSET in their communities.

Introduction

Merchant Training programs give owners, managers, and staff of establishments that serve alcohol knowledge and skills to help them serve alcohol responsibly and within the law. The Beverage Alcohol Sellers and Servers Education and Training (BASSET) program is the State of Illinois' seller/server training program.

The objectives of the BASSET program are to:

- Spot signs of intoxication and intervene
- Prevent DUIs and alcohol-related fatalities
- Stop underage sales and underage drinking
- Create safer communities and alcohol establishments
- Educate establishments on regulations guiding alcohol service

Evidence

This strategy has been found to have some effect alone, however, studies point out that the most effective programs are those that are mandatory, include owners and managers as well as servers, and where there is active and visible enforcement (i.e. compliance checks).

Results of eleven studies published between 1987 and 2009 showed that Responsible Beverage Service led to positive changes in establishment policies and practices, such as checking ID of underage-looking customers, eliminating drink promotions, providing safe drinking information for customers, denying service to obviously intoxicated customers, promotions of food and non-alcoholic beverages, and arrangement of alternative transportation. Sources: The

Source: Hoover(5)

Characteristics of Effective RBS Training

Research on RBS training indicates several key characteristics that are associated with greater effectiveness (Mosher et al., 2002):

- Comprehensive training that includes the physical and social impact of alcohol; local and state laws; techniques to prevent service/sales to minors and refusing service/sales to intoxicated patrons.
- Include skill development component with role playing
- Target both managers AND servers
- Include management policy development
- Last a minimum length of four hours
- Criteria and procedures for certifying training, trainers, and trainees
- Periodic refresher or booster training
- Active monitoring of training programs, trainee, and licensee compliance

Benefits of BASSET

BASSET has many benefits including prevention of underage drinking and drunk driving, and prevention of alcohol related problems like property damage and physical assault. The Illinois Liquor Control Commission encourages voluntary participation in BASSET to equip alcohol servers and sellers with the skills necessary to prevent any alcohol-related mishaps. BASSET training can also reduce an establishments' liquor liability insurance.

For more information about BASSET, visit: http://www.illinois.gov/ilcc/Education/Pages/BASSET/Home.aspx.

Training Strategy

Remember that we stated earlier that research indicates that the most effective RBS programs are those that are mandatory and include owners and managers as well as servers. BASSET training is not mandatory in the State of Illinois, however some municipalities in the State of Illinois do require BASSET training. There are over 150 liquor license authorities in Illinois who have established specific training requirements as a condition for employment in a liquor-serving establishment. Some communities require training for businesses and employees who fail initial compliance checks. It's important to determine whether there are server/seller training requirements in your community before initiating the program. If none exist, communities may advocate for ordinances or mandates that require training or administer a voluntary program. Mandatory programs will result in a higher percentage of trained servers and sellers than voluntary programs, making mandatory programs more likely to have the desired result of reduced sales of alcohol to minors and alcohol-related problems.

Planning Training

Schedule

Training should be accessible to all servers/sellers in the community. Training should be offered:

- prior to compliance check operations,
- frequently enough to accommodate the number of servers/sellers in the community and to account for turnover,
- in locations that are convenient for participants to get to,
- in the preferred format of participants (online and/or classroom), and
- at times when participants are available.

Trainers

There are currently over 200 licensed BASSET providers throughout the State of Illinois (http://www.illinois.gov/ilcc/Education/Pages/BASSET/Training-Class-Directory.aspx). Determine whether there are trainers available in your community or identify new/additional trainers to deliver the program.

A license must be obtained in order to conduct training classes. BASSET trainers become certified by successfully completing a licensed and recognized instruction training course (http://www.illinois.gov/ilcc/All%20documents%20site%20wide/Education/Basset/training.pdf) and submitting an application and \$250 (annual) fee to the Illinois Liquor Control Commission.

Curriculum

All Illinois-licensed BASSET curricula must include, at a minimum, information in the following areas of instruction:

- ✓ Area 1: Physical properties of alcohol, drugs and alcoholism
- ✓ Area 2: Prevention and Intervention techniques
- ✓ Area 3: Illinois State statutes, local ordinances, Illinois DUI laws
- ✓ Area 4: Proper identification techniques, police policies and expectations
- ✓ Area 5: Dram shop liabilities, insurance and victim's rights

Promotion

BASSET should be promoted in a way that ensures all alcohol establishments are aware that training is available and the benefits of participating. Strategies for promoting the program include:

- Letters to each licensed establishment, delivered in-person or by mail prior to compliance check operations
- Chambers of Commerce/local business networks
- Flyers included with compliance check failure and success notifications
- Mass media (local advertisements)

Collect and Report Outputs

SAPP Providers implementing BASSET in conjunction with alcohol compliance checks are required to report:

- Number of BASSET trainings offered
- Number of participants completing BASSET trainings
- Number of retailers for which at least one staff member is trained during the fiscal year

SAPP Providers who are partnering with other organizations to implement BASSET should ensure that an MOU is in place that includes an agreement and process for obtaining the required information.

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