

ANNUAL SYNAR REPORT

42 U.S.C. 300x-26

OMB No 0930-0222

FFY 2010

State: CA



U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Substance Abuse and Mental Health Services Administration
Center for Substance Abuse Prevention
www.samhsa.gov

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INTRODUCTION

The Annual Synar Report (ASR) format provides the means for States to comply with the reporting provisions of the Public Health Service Act (42 U.S.C. 300x-26) and the Tobacco Regulation for the SAPT Block Grant (45 C.F.R. 96.130 (e)).

Public reporting burden for the collection of information is estimated to average 15 hours for Section I and 3 hours for Section II, including the time for reviewing instructions, completing and reviewing the collection of information, searching existing data sources, and gathering and maintaining the data needed. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to SAMHSA Reports Clearance Officer; Paperwork Reduction Project; 1 Choke Cherry Road, 7th Floor Rockville, Maryland 20857.

An agency may not conduct or sponsor and a person is not required to respond to a collection of information unless it displays a currently valid OMB control number. The OMB control number for this project is 0930-0222 with an expiration date of 10-31-2010.

How the Synar report helps the Center for Substance Abuse Prevention

In accordance with the tobacco regulations, States are required to provide detailed information on progress made in enforcing youth tobacco access laws (FFY 2009 Compliance Progress) and future plans to ensure compliance with the Synar requirements to reduce youth tobacco access rates (FFY 2010 Intended Use Plan). These data are required by 42 U.S.C. 300x-26 and will be used by the Secretary to evaluate State compliance with the statute. Part of the mission of the Center for Substance Abuse Prevention (CSAP) is to assist States¹ by supporting Synar activities and providing technical assistance helpful in determining the type of enforcement measures and control strategies that are most effective. This information is helpful to CSAP in improving technical assistance resources and expertise on enforcement efforts and tobacco control program support activities, including State Synar Program support services, through an enhanced technical assistance program involving conferences and workshops, development of training materials and guidance documents, and on-site technical assistance consultation.

How the Synar report can help States

The information gathered for the Synar report can help States describe and analyze sub-State needs for program enhancements. These data can also be used to report to the State legislature and other State and local organizations on progress made to date in enforcing youth tobacco access laws when aggregated statistical data from State Synar reports can demonstrate to the Secretary the national progress in reducing youth tobacco access problems. This information will also provide Congress with a better understanding of State progress in implementing Synar, including State difficulties and successes in enforcing retailer compliance with youth tobacco access laws.

¹The term State is used to refer to all the States and territories required to comply with Synar as part of the Substance Abuse Prevention and Treatment Block Grant Program requirements (42 U.S.C. 300x-64 and 45 C.F.R. 96.121).

Getting assistance in completing the Synar report

If you have questions about programmatic issues, you may call CSAP's Division of State Programs at (240) 276-2413 and ask for your respective State Project Officer, or contact your State Project Officer directly by telephone or e-mail using the directory provided in the FY 2010 Uniform Application, Appendix A. If you have questions about fiscal or grants management issues, you may call the Grants Management Officer, Office of Program Services, Division of Grants Management, at (240) 276-1422.

Where and when to submit the Synar report

The Annual Synar Report (ASR) must be received by SAMHSA no later than December 31, 2009. The ASR must be submitted in the **approved OMB report format**. Use of the approved format will avoid delays in the review and approval process. The chief executive officer (or an authorized designee) of the applicant organization must sign page 1 of the ASR certifying that the State has complied with all reporting requirements.

The State must upload one copy of the ASR using the online WebBGAS (Block Grant Application System). In addition, the following items must be uploaded to WebBGAS:

- FFY 2010 Synar Survey Results: States that use the Synar Survey Estimation System (SSES) must upload one copy of SSES Tables 1-5 (in Excel) to WebBGAS. States that do not use SSES must upload one copy of ASR Forms 1, 4 and 5, and Forms 2 and 3, if applicable, (in Excel) to WebBGAS.
- Synar Inspection Form: States must upload one blank copy of the inspection form used to record the result of each Synar inspection.
- Synar Inspection Protocol: States must upload a copy of the protocol used to train inspection teams on conducting and reporting the results of the Synar inspections.

Each State SSA Director has been e-mailed a login ID and password to log onto the Synar section of the WebBGAS site.

Additionally, the State must submit one signed original of the report (including the signed Funding Agreements/Certifications), as well as one additional copy of the signed Funding Agreements/Certifications, to the Grants Management Officer at the address below:

Ms. Barbara Orlando
Grants Management Officer
Office of Program Services
Division of Grants Management
Substance Abuse and Mental Health Services Administration

Regular Mail:

1 Choke Cherry Road, Rm.7-1091
Rockville, Maryland 20857

Overnight Mail:

1 Choke Cherry Road, Rm.7-1091
Rockville, Maryland 20850

FFY 2010: FUNDING AGREEMENTS/CERTIFICATIONS

The following form must be signed by the Chief Executive Officer or an authorized designee and submitted with this application. Documentation authorizing a designee must be attached to the application.

PUBLIC HEALTH SERVICES ACT AND SYNAR AMMENDMENT

42 U.S.C. 300x-26 requires each State to submit an annual report of its progress in meeting the requirements of the Synar Amendment and its implementing regulation (45 C.F.R. 96.130) to the Secretary of the Department of Health and Human Services. By signing below, the chief executive officer (or an authorized designee) of the applicant organization certifies that the State has complied with these reporting requirements and the certifications as set forth below.

SYNAR SURVEY SAMPLING METHODOLOGY

The State certifies that the Synar survey sampling methodology on file with the Center for Substance Abuse Prevention and submitted with the Annual Synar Report for FFY 2010 is up-to-date and approved by the Center for Substance Abuse Prevention.

SYNAR SURVEY INSPECTION PROTOCOL

The State certifies that the Synar Survey Inspection Protocol on file with the Center for Substance Abuse Prevention and submitted with the Annual Synar Report for FFY 2010 is up-to-date and approved by the Center for Substance Abuse Prevention.

State:

Name of Chief Executive Officer or Designee:

Signature of CEO or Designee:

Title: _____

Date Signed: _____

If signed by a designee, a copy of the designation must be attached.

SECTION I: FFY 2009 (Compliance Progress)

YOUTH ACCESS LAWS, ACTIVITIES, AND ENFORCEMENT

42 U.S.C. 300x-26 requires the States to report information regarding the sale/distribution of tobacco products to individuals under age 18.

1. Please indicate any changes or additions to the State tobacco statute(s) relating to youth access since the last reporting year. If any changes were made to the State law(s) since the last reporting year, please attach a photocopy of the law to the hard copy of the ASR and also upload a copy of the State law to WebBGAS. (see 42 U.S.C. 300x-26).

a. Has there been a change in the *minimum sale age* for tobacco products?

Yes No

If Yes, current minimum age: 19 20 21

b. Have there been any changes in State law that impact the State's *protocol for conducting Synar inspections*? Yes No

If Yes, indicate change. (Check all that apply.)

Changed to require that law enforcement conduct inspections of tobacco outlets

Changed to make it illegal for youth to possess, purchase or receive tobacco

Changed to require ID to purchase tobacco

Other change(s) *(Please describe.)* _____

c. Have there been any changes in the law concerning *vending machines*?

Yes No

If Yes, indicate change. (Check all that apply.)

Total ban enacted

Banned from location(s) accessible to youth

Locking device or supervision required

Other change(s) *(Please describe.)* _____

d. Have there been any changes in State law that impact the following?

Licensing of tobacco vendors Yes No

Penalties for sales to minors Yes No

2. Describe how the Annual Synar Report (see 45 C.F.R. 96.130(e)) and the State Plan (see 42 U.S.C. 300x-51) were made public within the State prior to submission of the ASR. (Check all that apply.)

- Placed on file for public review
- Posted on a State agency Web site (Please provide exact Web address.)
<http://www.adp.ca.gov>*
- Notice published in a newspaper or newsletter
- Public hearing
- Announced in a news release, a press conference, or discussed in a media interview
- Distributed for review as part of the SAPT Block Grant application process
- Distributed through the public library system
- Published in an annual register
- Other change(s) (Please describe.) _____

*Note: The California Department of Alcohol and Drug Programs (ADP) posts a draft copy of the ASR on the ADP website for public review and comment for two weeks prior to submitting the final ASR to SAMHSA for approval. When the ASR is submitted to SAMHSA, it is removed from the Web site. Once the ASR is approved, ADP reposts the final version on the Web site at:
<http://www.adp.ca.gov/Funding/synar.shtml>

3. Identify the following agency or agencies (see 42 U.S.C. 300x-26 and 45 C.F.R. 96.130).

a. The State agency(ies) designated by the Governor for oversight of the Synar requirements:

ADP and the California Department of Public Health (CDPH) have shared responsibility to oversee the Synar requirements. The Stop Tobacco Access to Kids Enforcement (STAKE) Act of 1994 (Business and Professions [B&P] Code Section 22950-22963) requires the annual transfer of \$2 million from ADP’s SAPT block grant to CDPH to administer the provisions of the Synar Amendment.

Has this changed since last year’s Annual Synar Report? Yes No

b. The State agency(ies) responsible for conducting random, unannounced Synar inspections:

CDPH has contracts with the Behavioral Health Institute (BHI) of the San Diego State University Research Foundation, a nonprofit education corporation organized under the laws of the State of California, to conduct the annual random, unannounced inspections of tobacco outlets.

Has this changed since last year’s Annual Synar Report? Yes No

c. The State agency(ies) responsible for enforcing youth tobacco access law(s):

CDPH, Food and Drug Branch (FDB) is the statewide enforcement agency responsible for enforcing the STAKE Act; however, as a result of legislation enacted in 2007, other state agencies as well as local law enforcement agencies are

now authorized to enforce the STAKE Act. In addition, local law enforcement agencies are responsible for enforcing other tobacco control laws, including Penal Code (PC) Section 308(a), illegal tobacco sales to minors.

Has this changed since last year's Annual Synar Report? Yes No

4. Identify the State agency(ies) responsible for tobacco prevention activities.

CDPH, California Tobacco Control Program (CTCP) is responsible for administering California's statewide tobacco prevention and control activities as authorized in Health and Safety Code Part 3, Chapter 1, Section 104350, to comply with Proposition (Prop) 99, the Tobacco Tax and Health Protection Act of 1988.

Has the responsible agency changed since last year's Annual Synar Report?

Yes No

a. Describe the coordination and collaboration that occur between the agency responsible for tobacco prevention and the agency responsible for oversight of the Synar requirements. (Check all that apply.) The two agencies

- Are the same
- Have a formal written memorandum of agreement
- Have an informal partnership
- Conduct joint planning activities
- Combine resources
- Have other collaborative arrangement(s) *(Please describe.)* Oversight of the Synar requirements is a shared responsibility: 1) CDPH is responsible for conducting the annual Synar survey and preparation of the ASR; and 2) ADP is responsible for review and State approval of the ASR and submission to SAMHSA as part of the SAPT block grant application.

5. Please answer the following questions regarding the State's activities to enforce the youth access to tobacco law(s) in FFY 2009 (see 42 U.S.C. 300x-26 and 45 C.F.R. 96.130(e)).

a. Which one of the following describes the enforcement of youth access to tobacco laws carried out in your State? (Check one category only.)

- Enforcement is conducted exclusively by local law enforcement agencies.
- Enforcement is conducted exclusively by State agency(ies).
- Enforcement is conducted by both local and State agencies.

b. The following items concern penalties imposed for violations of youth access to tobacco laws by LOCAL AND/OR STATE LAW ENFORCEMENT AGENCIES. Please fill in the number requested. If State law does not allow for an item, please mark "NA" (not applicable). If a response for an item is unknown, please mark "UNK." The chart must be filled in completely.

PENALTY	OWNERS	CLERKS	TOTAL
Number of <u>citations issued</u>	875	0	875 ¹
Number of <u>fin es assessed</u>	875	0	875 ¹
Number of <u>permits/licenses suspended</u>	136		136 ²
Number of <u>permits/licenses revoked</u>	10		10 ²
Other (<i>Please describe.</i>)			

¹Reflects only those civil penalties assessed by FDB. Citations and fines assessed by over 2,000 local enforcement agencies are not reported to any state agency and therefore are not available.

²Assessed by the California Board of Equalization (BOE) for non-compliance with state tobacco retail licensing statutes. All suspensions and revocations were for reasons other than tobacco sales to minors. Tobacco retail license suspensions and revocations conducted by local jurisdictions are not tracked by any state agency.

c. What additional activities are conducted in your State to support enforcement and compliance with State tobacco access law(s)? (*Check all that apply.*)

- Merchant education and/or training
- Incentives for merchants who are in compliance (e.g., reward and reminder)
- Community education regarding youth access laws
- Media use to publicize compliance inspection results
- Community mobilization to increase support for retailer compliance with youth access laws
- Other activities (*Please list.*) Collaboration with the California Attorney General's (AG) Office, Tobacco Litigation Unit; Collaboration with the BOE, Tobacco Licensing Program; and Evaluation and Surveillance Activities

Briefly describe all checked activities:

Merchant Education and/or Training:

CTCP uses a multi-faceted, multi-agency, coordinated approach to educate approximately 38,000 California tobacco retailers about youth access laws. This includes dissemination of a tobacco retailer PowerPoint training titled *Stop Tobacco Sales to Youth: California Retailers and Youth Tobacco Laws*. It includes an introductory letter to retailers and a clerk quiz. This training tool is accessible to the public on both the CTCP Web site and the Strategic Tobacco Retail Effort (STORE) Web site at:

<http://www.cdph.ca.gov/programs/Tobacco/Pages/CTCPRetailerResources.aspx>
<http://www.tcsstore.org/appendix/updated.html>

CTCP also develops and provides educational materials. These materials are used to conduct merchant education, training, and inspections at the local and regional level. Approximately 149,045 pieces of educational materials were distributed to retailers, local and state law enforcement agencies, local health departments, community-based organizations, and tobacco companies from July 1, 2008 through June 30, 2009. Educational materials disseminated included a ten-item information kit titled *Avoiding Fines and Penalties While Selling Tobacco*, a brochure (updated in 2008) titled *Tobacco Control Laws That Affect Retail Businesses*, and the STAKE Act age-of-sale warning sticker signs. Approximately 20,000 copies of the brochure, 30,300 copies of the sticker signs, and 1,150 complete kits were shipped to BOE upon request for distribution to retailers applying for or renewing their tobacco seller's license.

FDB's STAKE Act Enforcement Unit also conducts merchant education by either providing retail store personnel with educational materials about California's tobacco retail laws, or by referring them to the Tobacco Education Clearinghouse of California (TECC) if additional materials are needed. This information is provided subsequent to a STAKE Act inspection resulting in an unlawful sale to a decoy, and during the retailer notification of the violation. In addition, FDB sends official letters to STAKE Act violators, outlining abbreviated compliance requirements of youth access laws. Approximately 875 letters were mailed to tobacco retailers between July 2008 and June 2009. During FFY 2010, the STAKE Act Enforcement Unit will continue to conduct undercover on-site tobacco retailer inspections using teen-aged decoys ages 15-16 as mandated. The STAKE Act investigators conduct over 2,500 inspections annually. Stores checked for compliance are generally selected on a random basis within a given geographic area and/or in response to reports of illegal tobacco sales left on the toll-free number hotline by concerned citizens.

Incentives for merchants who are in compliance:

All of the 61 local county and city health departments and many of the competitive grantees funded by CTCP utilize various interventions to reduce youth access to tobacco and encourage enforcement of tobacco laws affecting retailers. Numerous programs engage in various forms of merchant incentives, including retailer public recognition for compliance via press releases, newspaper articles, Web site postings, plaques, store signage and sticker campaigns, and "report card" programs highlighting youth access law compliance.

Community education regarding youth access laws:

CTCP creates and updates youth access materials for tobacco control advocates in the field. These materials are available statewide through TECC. Staff members of TECC, as well as the CTCP's Media Unit, are available to assist the state's tobacco control advocates in the creation of specific materials. Additionally, professional artwork designed by CTCP's Media Unit is provided for statewide projects to utilize when they design collateral materials. Staff from local projects utilize available materials from the TECC catalog and/or create original materials for local distribution. Many of these materials promote the STAKE Act-mandated toll-free

complaint line. Between June 2008 and July 2009, the complaint line logged only 13 calls from the public reporting possible illegal tobacco sales to youth, a significant decrease from previous years. (An investigation into the operational status of the complaint line determined that it had been subjected to vandalism and was being misused by an anonymous caller[s].)

Media used to publicize compliance inspection results:

Local county health departments regularly release the results of their local youth tobacco purchase surveys, resulting in media coverage on the issue throughout the state. Additionally, the results of the 2008 Youth Tobacco Purchase Survey (YTPS) were posted on the homepage of CDPH's Web site under "What's New" and then moved to the "News, Alerts, Events" section when deemed timely to do so. The posting was visited approximately 962 times between October 1, 2008 to June 30, 2009, with approximately 1,224 downloads.

The results of the 2009 YTPS will again be posted on the homepage of CDPH's Web site.

Community mobilization to increase support for retailer compliance with youth access laws:

CTCP-funded contractors conduct various educational and policy related interventions to reduce youth access to tobacco. Of the 61 local health departments' three-year comprehensive tobacco control plans (2007-10), 45 included conducting merchant education activities, 38 included conducting local youth tobacco purchase surveys, 23 included conducting law enforcement training, and 28 included conducting policy campaigns aimed at the following topic areas: local tobacco retail licensing, eliminating self-service tobacco displays, eliminating free tobacco product sampling, requiring conditional use permits, and restrictions on selling tobacco in pharmacies. In addition, ten competitive grantees are currently implementing educational- and/or policy-related interventions addressing these topic areas. Highlights during the last year include bans on sampling and the sale of tobacco in pharmacies in San Francisco, and the enactment of many new local tobacco retailer licensing policies. As of July 2009, a total of 102 local licensing policies are on the books in California, 64 include strong provisions that guarantee a self-sustaining, well-enforced local licensing program.

CTCP collaborates with its Point-of-Sales Practices (POSP) Workgroup on planning and implementing statewide technical assistance and skill building trainings on reducing tobacco availability for projects funded by CTCP. A new collaboration effort was launched in 2008 to plan, implement, and evaluate multiple regional law enforcement roundtables in geographically diverse areas of the state. The AG's Office, FDB, BOE, and local tobacco control projects have been active participants in this innovative project. The primary goal of the project is to enhance the enforcement of illegal sales to minors laws at the local level by:

- 1) stimulating collaboration between enforcement and public health agencies;
- 2) identifying best practices, challenges, and possible solutions pertaining to the

enforcement of youth access laws; and 3) promoting continuation of effort at the local level through the dissemination of best practices and a roundtable planning tool kit. Two highly successful roundtables were conducted between September 2008 and May 2009. Interim outcomes summary reports were disseminated to participants and CTCP-funded tobacco control projects. The reports are accessible on the STORE Web site at: <http://www.tcsstore.org/appendix/updated.html>. Interim planning tools are currently under development.

Due to the focus on the law enforcement roundtables project, CTCP did not provide any technical assistance trainings to CTCP-funded projects on youth access to tobacco during this reporting period.

Collaboration with the AG:

The AG's office provides CTCP with expert legal review of merchant education resources and offers valuable input into the development of statewide strategies to reduce sales to minors and promote compliance with California laws concerning the sale and marketing of tobacco products at retail. The AG's office provides CTCP with information and updates about new and existing multi-state agreements with national retail chains, known as Assurances of Voluntary Compliance (AVCs), concerning tobacco retailing, as well as information regarding tobacco manufacturer retailer programs. A total of thirteen agreements are now in place covering more than 95,000 retail outlets nationwide

Collaboration with BOE:

CTCP annually notifies BOE of the statewide rate of illegal tobacco sales to minors and FDB will be providing BOE with adjudicated STAKE Act violation data in order to facilitate tobacco retailer license suspension and revocation requirements of the Licensing Act (Cigarette and Tobacco Products Licensing Act of 2003 [Licensing Act], B&P Code commencing with Section 22970). CTCP also solicits expert review of merchant education materials from BOE and coordinates mass mailings of educational brochures, STAKE Act age-of-sale warning signs, and order forms for merchant education materials through routine BOE mailings to retailers. BOE provides valuable input into the development of statewide strategies to strengthen retailer licensing efforts and improve enforcement of the Licensing Act. Since 2008, CTCP and CTCP-funded contractors have collaborated with BOE on the implementation of an ongoing regional retailer training program. While the primary purpose of the BOE trainings is to educate tobacco retailers about the Licensing Act, the training classes present a unique outreach opportunity for local tobacco control projects.

Evaluation and Surveillance Activities:

CTCP conducts ongoing surveillance through the California Tobacco Survey and the California Adult Tobacco Survey to monitor support for enforcement of tobacco sales to minors laws and regulatory efforts to decrease youth access to tobacco.

- d. Are citations or warnings issued to retailers or clerks who sell tobacco to minors for inspections that are part of the Synar survey?** Yes No

If “Yes” to 5d, please describe the State’s procedure for minimizing risk of bias to the survey results:

N/A

SYNAR SURVEY METHODS AND RESULTS

The following questions pertain to the survey methodology and results of the Synar survey used by the State to meet the requirements of the Synar Regulation in FFY 2009 (see 42 U.S.C. 300x-26 and 45 C.F.R. 96.130).

- 6. Has the sampling methodology changed from the previous year?** Yes No

The State is required to have an approved up-to-date description of the Synar sampling methodology on file with CSAP. Please submit a copy of your Synar Survey Sampling Methodology (Appendix B). If the sampling methodology changed from the previous reporting year, these changes must be reflected in the methodology submitted.

- 7. Please answer the following questions regarding the State's annual random, unannounced inspections of tobacco outlets** (see 45 C.F.R. 96.130(d)(2)).

- a. Did the State use the optional Synar Survey Estimation System (SSES) to analyze the Synar survey data?** Yes No

If Yes, attach SSES summary tables 1, 2, 3, and 4 to the hard copy of the ASR and upload a copy of SSES tables 1-5 (in Excel) to WebBGAS. Then go to Question 8. If No, continue to Question 7b.

- b. Report the weighted and unweighted Retailer Violation Rate (RVR) estimates, and the standard error.**

Unweighted RVR _____

Weighted RVR _____

Standard error (s.e.) of the (weighted) RVR _____

Fill in the blanks to calculate the right limit of the right-sided 95% confidence interval.

$$\underline{\hspace{2cm}} \quad + \quad (1.645 \quad \times \quad \underline{\hspace{2cm}}) \quad = \quad \underline{\hspace{2cm}}$$

RVR Estimate plus (1.645 times Standard Error) equals Right Limit

- c. Fill out Form 1 in Appendix A (Forms).** (Required regardless of the sample design.)

- d. How were the (weighted) RVR estimate and its standard error obtained?** (Check the one that applies.)

Form 2 (Optional) in Appendix A (Forms) (Attach completed Form 2.)

Other (Please specify. Provide formulae and calculations or attach and explain the program code and output with description of all variable names.)

- e. If stratification was used, did any strata in the sample contain only one outlet or cluster this year?** Yes No No stratification

If Yes, explain how this situation was dealt with in variance estimation.

f. Was a cluster sample design used? Yes No

If Yes, fill out and attach Form 3 in Appendix A (Forms 1–5), and answer the following question.

If No, go to Question 7g.

Were any certainty primary sampling units selected this year? Yes No

If Yes, explain how the certainty clusters were dealt with in variance estimation.

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g. Report the following outlet sample sizes for the Synar survey.

	Sample Size
Effective sample size (sample size needed to meet the SAMHSA precision requirement assuming simple random sampling)	
Target sample size (the product of the effective sample size and the design effect)	
Original sample size (inflated sample size of the target sample to counter the sample attrition due to ineligibility and non-completion)	
Eligible sample size (number of outlets found to be eligible in the sample)	
Final sample size (number of eligible outlets in the sample for which an inspection was completed)	

h. Fill out Form 4 in Appendix A (Forms 1–5).

8. Did the State’s Synar survey use a list frame? Yes No

If Yes, answer the following questions about its coverage.

a. The calendar year of the latest frame coverage study: 2007

b. Percent coverage from the latest frame coverage study: 92.5%

c. Was a new study conducted in this reporting period? Yes No

If Yes, please complete Appendix D (List Sampling Frame Coverage Study) and submit it with the Annual Synar Report.

d. The calendar year of the next coverage study planned: 2012

9. Has the Synar survey inspection protocol changed from the previous year?

Yes No

The State is required to have an approved up-to-date description of the Synar inspection protocol on file with CSAP. Please submit a copy of your Synar Survey Inspection Protocol (Appendix C). If the inspection protocol changed from the previous year, these changes must be reflected in the protocol submitted.

a. Provide the inspection period: From 03/07/09 To 06/25/09
MM/DD/YY MM/DD/YY

b. Provide the number of youth inspectors used in the current inspection year:

65

NOTE: If the State uses SSES, please ensure that the number reported in 9b matches that reported in SSES Table 4, or explain any difference.

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c. Fill out and attach Form 5 in Appendix A (Forms 1–5). *(Not required if the State used the Synar Survey Estimation System (SSES) to analyze the Synar survey data.)*

SECTION II: FFY 2010 (Intended Use):

Public law 42 U.S.C. 300x-26 of the Public Health Service Act and 45 C.F.R. 96.130 (e) (4, 5) require that the States provide information on future plans to ensure compliance with the Synar requirements to reduce youth tobacco access.

1. In the upcoming year, does the State anticipate any changes in the:

Synar sampling methodology Yes No

Synar inspection protocol Yes No

If changes are made in either the Synar sampling methodology or the Synar inspection protocol, the State is required to obtain approval from CSAP prior to implementation of the change and file an updated Synar Survey Sampling Methodology (Appendix B) or an updated Synar Survey Inspection Protocol (Appendix C), as appropriate.

2. Please describe the State's plans to maintain and/or reduce the target rate for Synar inspections to be completed in FFY 2010. Include a brief description of plans for law enforcement efforts to enforce youth tobacco access laws, activities that support law enforcement efforts to enforce youth tobacco access laws, and any anticipated changes in youth tobacco access legislation or regulation in the State.

Plans to maintain and/or reduce the target rate for Synar inspections to be completed in FFY 2010:

Reducing illegal tobacco sales to minors is a major effort of CTCP. Multi-year funding is provided to 61 local health departments, all of which are required to address reducing tobacco access to minors in their comprehensive tobacco control plans. Additionally, funds are made available to non-profit organizations to address illegal tobacco sales to minors through a competitive grant process. In the last year, many jurisdictions that have enacted local retailer licensing policies have documented significant reductions in illegal sales rates. This trend is anticipated to continue. Looking ahead, CTCP will continue to focus on: 1) supporting the enactment of comprehensive local tobacco retail licensing policies which incorporate license fees earmarked for enforcement of youth access laws; and 2) providing technical assistance and training to local jurisdictions regarding tobacco retail licensing implementation issues. The STORE Web site, launched in 2001, provides a one-stop-shopping electronic toolbox of enforcement best practices, advertisements, case studies, checklists, enforcement guidelines, merchant education materials, PowerPoint presentations, sample forms, sample letters, sample opinion editorials, survey instruments, and protocols, etc., aimed at assisting CTCP contractors to strategically address the retail sale and marketing of tobacco. In the near future, CTCP plans to increase the functionality of the California Online Database for Enforcement (CODE)—a data management tool for local jurisdictions—as well as the STORE Web site.

CTCP will continue to fund several statewide contracts to support local efforts to reduce the availability of tobacco. The Technical Assistance Legal Center (TALC), a CTCP-funded agency, revised its model licensing ordinance which provides a template for the funded projects to use locally in developing their policies. In addition, TALC developed several optional provisions, called “plug-ins,” to strengthen and/or tailor local

licensing ordinances to address specific community needs. TALC will continue to train CTCP-funded projects on retailer licensing and comprehensive policies to reduce tobacco availability in local communities around the state. CTCP also continues to fund the statewide California Youth Advocacy Network (CYAN). It is anticipated that CYAN's tobacco retail licensing advocacy campaign, "Mission: Possible," will continue to support the engagement of youth in local tobacco retail licensing efforts conducted by CTCP-funded projects. "Mission: Possible" not only orchestrated a successful statewide Tobacco Retail Licensing Day of Action in April 2009, but utilized contemporary social networking strategies to increase involvement of youth in local tobacco retailer licensing efforts statewide. The Center for Tobacco Policy and Organizing (the Center) will continue to provide technical assistance and hands-on training to CTCP-funded projects conducting community organizing and strategic planning activities as well as youth access-related policy work in their communities. A special emphasis of the Center's training efforts will continue to focus on local tobacco retailer licensing campaigns, particularly in rural jurisdictions.

CTCP will continue to refresh, develop and provide state-of-the-art, tailored educational materials and utilize advertising and public relations strategies, as resources allow, to promote a reduction in tobacco sales to minors. To coincide with the revitalization of the STORE Campaign Web site, CTCP will explore alternative ways of delivering and packaging education and training information and materials to CTCP-funded contractors, retailers, and law enforcement personnel.

Plans for law enforcement efforts to enforce youth tobacco access laws:

During FFY 2010, FDB's STAKE Act Enforcement Unit will continue to conduct undercover on-site inspections at tobacco retailers using teenaged decoys as mandated. The STAKE Act's 13 investigators conduct more than 2,500 inspections annually throughout the state, covering a territory encompassing 163,707 square miles. Stores checked for compliance are selected on a random basis within a given geographic area and/or in response to reports of illegal tobacco sales left on the toll-free number by concerned citizens. Prior violators may also be targeted for verification of compliance, if the toll-free complaint line cannot be repaired in a timely manner to receive viable complaints from the public. STAKE investigators continue to support two tobacco access-related ordinances in effect in the Cities of Los Angeles and Santa Ana by providing contracted STAKE Act enforcement activities therein. Results of contract inspections conducted at retailers within these two cities are reported to respective City officials in furtherance of local jurisdictional enforcement provisions.

Planned activities that support law enforcement efforts to enforce youth access laws:

Local tobacco control programs will continue to engage in various forms of law enforcement assistance activities, such as youth recruitment, training, violation tracking, surveillance, Law Enforcement Roundtables, merchant education, and policy development. Statewide technical assistance and training will continue to be provided to law enforcement personnel to promote enforcement of local tobacco retailer licensing laws, the STAKE Act, and PC 308(a). CTCP and the POSP Workgroup will monitor local enforcement of the STAKE Act and promote the use of the CODE database as well as the "Tracking and Reporting Illegal Tobacco Sales to Minors: A How-to Guide for

Projects Funded by the California Tobacco Control Program,” and update the tool as needed. CTCP and FDB’s STAKE Act Enforcement Unit will continue to utilize their Web sites and educational materials to promote the toll-free complaint line created for public reporting of tobacco sales to minors. In addition, technical assistance and training will continue to be provided to tobacco control projects via the STORE Campaign as new, tailored interventions and model policies are developed.

In FFY 2010, CTCP, in collaboration with the POSP Workgroup, is planning to implement one to two regional Law Enforcement Roundtables in diverse geographical regions of the state. The focus of these events will be on local enforcement of sales to minors laws, including tobacco retailer licensing laws. CTCP will prepare and disseminate a final outcomes report to local tobacco control projects, law enforcement agencies, and other identified groups. The final report will highlight enforcement best practices, lessons learned, and recommendations for local jurisdictions with regards to conducting their own Law Enforcement Roundtables. The goal is to release the final report in conjunction with training and technical assistance efforts.

Any anticipated changes in youth tobacco access legislation or regulation in the State:

Senate Bill (SB) 600 and SB 400 were introduced in 2009. SB 600 would add a \$1.50 tax on a pack of cigarettes, and an equivalent tax on other tobacco products. It would provide that 85 percent of the tax revenues be deposited in the General Fund, and 15 percent to tobacco control and lung cancer research. Of the amount allocated to tobacco control and lung cancer research, 45 percent would be allocated to CTCP and 15 percent to enforcement. SB 400 proposes changing the definition of “tobacco products” in the Licensing Act and the STAKE Act to include electronic cigarettes.

The passage of the new Food and Drug Administration tobacco legislation (H.R. 1256) provides an opportunity for states to further regulate tobacco products in various ways. CTCP anticipates taking advantage of these new opportunities by developing and implementing new and/or expanded policy strategies at the state and local levels. Strategies that may be pursued include restricting the time, place, and/or manner of cigarette advertising and promotions in retail settings.

3. Describe any challenges the State faces in complying with the Synar regulation. (Check all that apply.)

- Limited resources for law enforcement of youth access laws
- Limited resources for activities to support enforcement and compliance with youth tobacco access laws
- Limitations in the State youth tobacco access laws
- Limited public support for enforcement of youth tobacco access laws
- Limitations on completeness/accuracy of list of tobacco outlets
- Limited expertise in survey methodology
- Laws/regulations limiting the use of minors in tobacco inspections
- Difficulties recruiting youth inspectors

- Geographic, demographic, and logistical considerations in conducting inspections
- Cultural factors (e.g., language barriers, young people purchasing for their elders)
- Issues regarding sources of tobacco under tribal jurisdiction
- Other challenges (*Please list.*) _____

Briefly describe all checked challenges and propose a plan for each, or indicate the State's need for TA related to each relevant challenge.

Limited resources for law enforcement of youth access laws:

FDB's STAKE Act Enforcement Unit operates with limited staff (13 investigators statewide) within a flat \$1.6 million annual budget which is additionally augmented by funds collected through penalty assessment. The budget situation limits inspection capacity to 8 percent of the approximately 38,000 retailers in the state. FDB has, to date, been unable to secure additional funds to mitigate this resource issue. If additional funding could be secured for STAKE Act enforcement operations, FDB would be able to hire more staff to cover not just more tobacco outlets, but more of the problem outlets. Added funding would also facilitate possible operational coordination between State and local law enforcement, pursuant to the 2008 STAKE Act cleanup bill (SB 624) now allowing local jurisdictions to enforce this law. Legislative change is a cumbersome process, and proposed bills stand a good chance of failing. Any future legislation that would increase resources for the STAKE program will need to be initiated, supported, and driven by local communities and advocacy organizations. Yet, competing budgetary interests makes it difficult to secure additional resources.

Limited resources for activities to support enforcement and compliance with youth tobacco access laws:

In-kind resources to support a statewide youth access media campaign continue to be very limited. Emphasis will be placed on providing technical assistance to local projects to locally develop media and educational materials and to increase the accessibility of local projects to previously developed CTCP-developed media materials. Although not funded by Synar, new retailer-oriented educational materials will be created by CTCP's materials development contractor and CTCP-funded local projects according to need, and made available to target audiences via the most efficient routes of dissemination.

Financial support for the STORE Campaign and POSP Workgroup activities has been and continues to be provided in-kind, such as the maintenance and enhancement of the STORE Campaign Web site, the provision of technical assistance and training for the field, the publication and dissemination of training materials such as the *Stop Tobacco Sales to Youth: California Retailers and Youth Tobacco Laws* curriculum for retailers, the PC 308 Enforcement Training Manual, the Tracking and Reporting of Adjudicated Cases "how-to" guide, and the planning and implementation of regional Law Enforcement Roundtables.

In FY 2008-09 CTCP allocated \$5,164,544 of Prop 99 funds to support the goals of the STAKE Act Program. Additional funds will be needed to conduct these activities in

the future, as tax revenues are declining and competition for the remaining funds for comprehensive tobacco control efforts will become even fiercer.

Limitations in California's youth tobacco access laws:

PC 308(a), a criminal law prohibiting the sale of tobacco products to minors, is enforced by local law enforcement agencies. Because the law is enforced through the criminal courts, local district attorneys are often reluctant to prosecute these cases due to their limited time and court costs. Authority for the enforcement of STAKE Act, which is a civilly prosecuted law, is no longer limited to FDB. However, CDPH believes it will be a challenge for local law enforcement agencies to allocate sufficient resources to conduct ongoing STAKE Act youth decoy operations that meet the legislatively defined operational guidelines.

Other than legislative fixes at the state level which come very slowly and are fraught with challenges, CTCP's support for local retail licensing policies with strong enforcement provisions has helped to ameliorate limitations in state statutes by increasing local enforcement of youth access laws and reducing illegal sales rates in communities across California. Support will continue for local tobacco retailer licensing efforts.

Difficulties recruiting youth inspectors:

The recruitment of youth inspectors is an ongoing challenge for a variety of reasons: a single contractor funded with in-kind monies to conduct youth recruitment activities statewide, conflicting youth priorities, youth aging out of the program, parents who do not want their children to participate, conflicting school schedules, and small rural communities where youth are well known and the anonymity of the youth is compromised. In addition, the sheer size of California presents a challenge in recruiting youth inspectors to cover the entire state.

CDPH will continue helping the youth recruitment contractor tailor recruitment strategies to reach specific communities, groups and institutions and adjust recruitment timeframes to increase the likelihood that youth of appropriate age and ethnic/racial background will be recruited for planned decoy operations.

Other Challenges:

Toll-free Complaint Line:

The toll-free telephone number promoted in California for the public to report incidences of unlawful tobacco sales to minors was actively monitored by FDB to generate a list of complaints for a geographical area from which investigators could supplement enforcement operations. However, the voicemail functionality associated with the phone number was vandalized and subjected to misuse by members of the public, resulting in reduced number of complaints received this past FFY 2009. Unless a preventative solution is found, or an alternative means of reporting is implemented, it is anticipated that the current complaint system will not provide complete and/or accurate information on noncompliant tobacco retailers in a given geographical area for FFY 2011.

Lack of publicized research documenting that illegal tobacco sales is associated with youth uptake of tobacco:

The evidence-base for the Synar Amendment is relatively weak in comparison to other tobacco control inventions, which makes this program difficult to defend when seeking financial support. Although a recently published national study linking enforcement of underage sales laws and youth smoking (DiFranza, et al., 2009) is a step in the right direction (<http://www.biomedcentral.com/content/pdf/1471-2458-9-107.pdf>), stronger scientific research documenting a link between the initiation of youth tobacco use and the illegal purchase of tobacco would create a stronger argument for additional funding.

APPENDIX B: SYNAR SURVEY SAMPLING METHODOLOGY

State: CA
 FFY: 2010

1. What type of sampling frame is used?

- List frame (*Go to Question 2.*)
- Area frame (*Go to Question 3.*)
- List-assisted area frame (*Go to Question 2.*)

2. List all sources of the list frame. Indicate the type of source from the list below. Provide a brief description of the frame source. Explain how the lists are updated (method), including how new outlets are identified and added to the frame. In addition, explain how often the lists are updated (cycle). (*After completing this question, go to Question 4.*)

Use the corresponding number to indicate Type of Source in the table below.

- | | |
|---|--|
| 1 – Statewide commercial business list | 4 – Statewide retail license/permit list |
| 2 – Local commercial business list | 5 – Statewide liquor license/permit list |
| 3 – Statewide tobacco license/permit list | 6 – Other |

Name of Frame Source	Type of Source	Description	Updating Method and Cycle
BOE licensing list	3	The licensing list is provided by BOE. The Cigarette and Tobacco Products Licensing Act of 2003 (California B&P Code Section 22970-22995) requires California retailers of cigarettes and tobacco products to obtain a license from BOE in order to sell tobacco products.	The list is continually updated by BOE.

3. If an area frame is used, describe how area sampling units are defined and formed.

N/A

- a. Is any area left out in the formation of the area frame?** Yes No

If Yes, what percentage of the State’s population is not covered by the area frame?
 _____%

4. Federal regulation requires that vending machines be inspected as part of the Synar survey. Are vending machines included in the Synar survey? Yes No

If No, please indicate the reason they are not included in the Synar survey.

- State law bans vending machines
- State law bans vending machines from locations accessible to youth

- State has SAMHSA approval to exempt vending machines from the survey
- Other (*Please describe.*) _____

5. Which category below best describes the sample design? (Check only one.)

- Census** (*STOP HERE: Appendix B is complete.*)

Unstratified State-wide sample:

- Simple random sample (*Go to Question 9.*)
- Systematic random sample (*Go to Question 6.*)
- Single-stage cluster sample (*Go to Question 8.*)
- Multi-stage cluster sample (*Go to Question 8.*)

Stratified sample:

- Simple random sample (*Go to Question 7.*)
- Systematic random sample (*Go to Question 6.*)
- Single-stage cluster sample (*Go to Question 7.*)
- Multi-stage cluster sample (*Go to Question 7.*)
- Other** (*Please describe and go to Question 9.*) _____

6. Describe the systematic sampling methods. (After completing Question 6, go to Question 7 if stratification is used. Otherwise go to Question 9.)

N/A

7. Provide the following information about stratification.

a. Provide a full description of the strata that are created.

N/A

b. Is clustering used within the stratified sample?

- Yes** (*Go to Question 8.*)
- No** (*Go to Question 9.*)

8. Provide the following information about clustering.

a. Provide a full description of how clusters are formed. (If multi-stage clusters are used, give definitions of clusters at each stage.)

N/A

b. Specify the sampling method (simple random, systematic, or probability proportional to size sampling) for each stage of sampling and describe how the method(s) is (are) implemented.

N/A

9. Provide the formulae for determining the effective, target, and original outlet sample sizes.

$$n_e = \frac{z_{1-\alpha/2}^2 p(1-p)}{d^2} = \frac{1.96^2 \times 0.20 \times (1-0.20)}{0.03^2} \approx 683$$

where,

$z_{1-\alpha/2} = 1.96$, which is $100(1-\alpha/2)$ percentile of the standard normal distribution with $\alpha = 0.05$,

p = target illegal sales rate of 0.2,

d = desired precision of 0.03 with respect to the two-sided 95% confidence interval.

The original sample size is then given by

$$n_o = \frac{n_e}{r_l r_c},$$

where r_l is an estimated eligibility rate and r_c is an estimated completion rate.

APPENDIX C

State: CA
FFY: 2010

SYNAR SURVEY INSPECTION PROTOCOL

Note: Attach a copy of the inspection form and protocol used to record the inspection result.

1. How does the State Synar survey protocol address the following?

a. Consummated buy attempts?

- Required Not Permitted
 Permitted under specified circumstances Not specified in protocol

b. Youth inspectors to carry ID?

- Required Not Permitted
 Permitted under specified circumstances Not specified in protocol

c. Adult inspectors to enter the outlet?

- Required Not Permitted
 Permitted under specified circumstances Not specified in protocol

d. Youth inspectors to be compensated?

- Required Not Permitted
 Permitted under specified circumstances Not specified in protocol

2. Identify the agency(s) or entity(s) that actually conduct the random, unannounced Synar inspections of tobacco outlets. (Check all that apply)

- Law enforcement agency(s)
 State or local government agency(s) other than law enforcement
 Private contractor(s)
 Other

List the agency name(s): San Diego State University Research Foundation Behavioral Health Institute (BHI).

3. Are Synar inspections combined with law enforcement efforts (i.e., do law enforcement issue warnings or citations to retailers found in violation of the law at the time of the inspection)?

- Always Usually Sometimes Rarely Never

4. Describe the methods used to recruit, select, and train youth inspectors and adult supervisors.

CTCP contracts with BHI of the San Diego State University Research Foundation to conduct the survey. BHI has substantial experience with conducting youth tobacco purchase surveys. Their responsibilities include: verification of stores, finalizing the survey instrument, recruitment of youth, training of youth and research assistants, conducting the survey, and entering the data.

BHI provided youth participants an hour and a half of training prior to participation in the youth tobacco purchase survey using a standardized training protocol. All youth-identifying data was kept confidential to protect the safety and identity of the youth. Youth were trained with a standardized training protocol.

BHI hired several adult research assistants to conduct the youth tobacco purchase survey in Southern California to augment their staff. The research assistants attended a two-hour training session prior to conducting fieldwork. At the first store site, the research assistants were observed by BHI staff to ensure that the survey procedures were properly followed. Adult supervisors were trained with a standardized training protocol.

5. Are there specific legal or procedural requirements instituted by the State to address the issue of youth inspectors' immunity when conducting inspections?

a. Legal **Yes** **No (If Yes, please describe):**

Minors' immunity from prosecution for survey and enforcement participation is granted in the language of the STAKE Act.

b. Procedural **Yes** **No (If Yes, please describe):**

6. Are there specific legal or procedural requirements instituted by the State to address the issue of the safety of youth inspectors during all aspects of the Synar inspection process?

a. Legal **Yes** **No (If Yes, please describe):**

b. Procedural **Yes** **No (If Yes, please describe):**

The safety of minors involved in all STAKE Act enforcement and survey inspection operations is of the utmost concern to all supervising adults and enforcement agents. The safety protocol used by BHI is as follows:

Youth are never sent into potentially volatile or dangerous situations. If adults or youth find themselves in an "uncomfortable" or "confrontational" situation while in a store or neighborhood, they are to exit the area immediately. No one is to confront a store clerk or customer for any reason. Youth are to report "uncomfortable" situations immediately to the accompanying adult.

All participants are instructed to wear seat belts while traveling in a car. Doors should be locked, and every effort made to act in a safety-conscious manner at all times. Adults are to be cautious drivers and obey all traffic rules. Participants should not jaywalk across streets or walk against red traffic lights.

Each accompanying adult is to carry a letter from CDPH verifying the legitimacy of the surveying activities. In addition, adults are required to carry the phone number of a BHI staff member who can be reached during the purchase attempt activities should a problem arise.

7. Are there any other legal or procedural requirements the State has regarding how inspections are to be conducted (e.g., age of youth inspector, time of inspections, training that must occur)?

a. Legal **Yes** **No** (*If Yes, please describe*):

STAKE Act requires using 15 or 16 year old youth in inspections.

b. Procedural **Yes** **No** (*If Yes, please describe*):

SSES Table 1 (Synar Survey Estimates and Sample Sizes)

CSAP-SYNAR REPORT

State	CA
Federal Fiscal Year (FFY)	2010
Date	7/16/2009 9:00
Data	testsses2009.xls
Analysis Option	Stratified SRS with FPC

Estimates

Unweighted Retailer Violation Rate	8.6%
Weighted Retailer Violation Rate	8.6%
Standard Error	1.0%
Is SAMHSA Precision Requirement met?	YES
Right-sided 95% Confidence Interval	[0.0%, 10.3%]
Two-sided 95% Confidence Interval	[6.5%, 10.6%]
Design Effect	1.0
Accuracy Rate (unweighted)	83.2%
Accuracy Rate (weighted)	83.2%
Completion Rate (unweighted)	98.5%

Sample Size for Current Year

Effective Sample Size	683
Target (Minimum) Sample Size	683
Original Sample Size	870
Eligible Sample Size	724
Final Sample Size	713
Overall Sampling Rate	2.3%

SSES Table 2 (Synar Survey Results by Stratum and by OTC/VM) STATE: CA FFY: 2010

Samp. Stratum	Var. Stratum	Outlet Frame Size	Estimated Outlet Population Size	Number of PSU Clusters Created	Number of PSU Clusters in Sample	Outlet Sample Size	Number of Eligible Outlets in Sample	Number of Sample Outlets Inspected	Number of Sample Outlets in Violation	Retailer Violation Rate(%)	Standard Error(%)
All Outlets											
1	1	37,803	31,459	N/A	N/A	870	724	713	61	8.6%	
Total		37,803	31,459			870	724	713	61	8.6%	1.0%
Over the Counter Outlets											
1	1	37,803	31,459	N/A	N/A	870	724	713	61	8.6%	
Total		37,803	31,459			870	724	713	61	8.6%	1.0%
Vending Machines											
1	1	0	0	N/A	N/A	0	0	0	0	0.0%	
Total		0	0			0	0	0	0	0.0%	0.0%

SSES Table 3 (Synar Survey Sample Tally Summary)

Disposition Code	Description	Count	Subtotal
EC	Eligible and inspection complete outlet	713	
Total (Eligible Completes)			713
N1	In operation but closed at time of visit	0	
N2	Unsafe to access	4	
N3	Presence of police	1	
N4	Youth inspector knows salesperson	2	
N5	Moved to new location but not inspected	0	
N6	Drive thru only/youth inspector has no drivers license	0	
N7	Tobacco out of stock	2	
N8	Run out of time	0	
N9	Other noncompletion (see below)	2	
Total (Eligible Noncompletes)			11
I1	Out of Business	43	
I2	Does not sell tobacco products	52	
I3	Inaccessible by youth	12	
I4	Private club or private residence	32	
I5	Temporary closure	2	
I6	Unlocatable	5	
I7	Wholesale only/Carton sale only	0	
I8	Vending machine broken	0	
I9	Duplicate	0	
I10	Other ineligibility	0	
Total (Ineligibles)			146
Grand Total			870

Give reasons and counts for other noncompletion:

Reason	Count
Purchase protocol completed incorrectly	2

SSES Table 4 (Synar Survey Inspection Results by Youth Inspector Characteristics)

Frequency Distribution

Gender	Age	Number of Inspectors	Attempted Buys	Successful Buys
Male	14	0	0	0
	15	10	144	10
	16	17	213	23
	17	0	0	0
	18	0	0	0
	Subtotal	27	357	33
Female	14	0	0	0
	15	23	226	10
	16	15	130	18
	17	0	0	0
	18	0	0	0
	Subtotal	38	356	28
Other		0	0	0
Grand Total		65	713	61

Buy Rate in Percent by Age and Gender

Age	Male	Female	Total
14	0.0%	0.0%	0.0%
15	6.9%	4.4%	5.4%
16	10.8%	13.8%	12.0%
17	0.0%	0.0%	0.0%
18	0.0%	0.0%	0.0%
Other			0.0%
Total	9.2%	7.9%	8.6%