

Michigan Department of Health and Human Services

Chaperone Guidance for Retailer Over the Counter (OTC) and Vending Machine (VM) Compliance Checks

1. Recruit individuals age 16 to 20 to be underage inspectors. Individuals age 16 to 17 must send a letter to their parent/guardian requesting their participation and return of a signed permission slip as well as obtain a work permit. Underage inspectors age 18 to 20 do not require a permission slip or work permit.
2. Contact your underage inspector to plan the dates and times for training and preparation, and dates and times your team will conduct this survey. All surveys must be completed by the prescribed deadline. If the deadline is on a weekend or holiday the PIHP may submit the survey report on the last working day prior to the deadline. *
3. Remind the underage inspector to dress as he/she normally dresses (this includes make-up). The youth inspector should not attempt to appear older than he/she is.
4. You are responsible for driving the underage inspector between sites and for ensuring their safety at all times. Seat belts must be worn. Carry the parental permission slips and emergency phone numbers with you. Arrange to pick up and drop off the underage inspector if necessary.
5. An inspection team should at minimum consist of one adult and two underage inspectors (one male and one female). One male or one female should work alternately at separate establishments and receive an equal number of assignments per region. This will allow OROSC and ultimately CSAP to determine if clerks exhibit a selling bias between males and females. Ideally, male chaperones should be paired with male underage inspectors and female chaperones should be paired with female underage inspectors. In addition, an adult chaperone must accompany each underage inspector and witness the attempted tobacco purchase.
6. Even though the teen will have received an underage inspector training, discuss the procedures for conducting the compliance check with them. Give him/her a copy of the procedure if necessary. Make sure the underage inspector is thoroughly trained and prepared to conduct the compliance checks.
7. You will be given a set of forms for randomly selected outlets. All forms must be completed. If a compliance check cannot be completed at a particular site, state the reason why. Also, correct any misspellings or incorrect addresses for an outlet on the form in the space provided. Be sure to fully complete and submit all original paperwork.
8. Your team does not want to give the impression of being together, *nor should you announce at any time the purpose of your visit.*
9. Survey the scene and plan your strategy for each outlet that you approach.
 - a. The chaperone **must** enter the outlet first; the chaperone can ensure that it is prudent for the underage inspector to enter and determine the presence of a vending machine (VM).
 - b. If the chaperone determines that the outlet is a candidate for a compliance check, he/she will return to the car to inform the youth inspector.
 - c. *If the outlet has an admittance policy posted that includes an age restriction that prohibits the youth from entering the outlet, do not allow the underage inspector to enter. Please instruct the teen to record on the report form that he/she could not inspect the outlet because of an age restriction.*
10. If the outlet is appropriate and not age restricted, the chaperone will then again enter the outlet and witness the attempted transaction. If the premise has a **vending machine**, the underage inspector will approach the cash register and ask for change for the cigarette vending machine. If

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the clerk gives the underage inspector change, he/she will approach the vending machine and deposit one coin. **This is considered a successful transaction, a non-consummated buy.** The underage inspector will then leave the outlet. If there is no vending machine present the underage inspector will attempt to purchase any brand of cigarettes, cigars, or loose tobacco products prevalent in the respective communities. Underage inspectors may also attempt to purchase a single cigarette or "loosie." The underage inspector will try to obtain the tobacco without the clerk's assistance, but if single packs are not within reach of customers, he/she will ask the clerk for it.

11. **Witness the attempted tobacco purchase.** This is necessary to validate the results since tobacco products were not actually purchased. A consummated check (completing the tobacco purchase) is only conducted in the presence of a law enforcement officer capable of writing a citation.
12. The underage inspector will be truthful about his/her age if asked by the clerk. He/she will provide identification if asked for it and reply that the tobacco is for him/herself if asked. The underage inspector should act natural and not reveal the true reason for being there.
13. If the clerk refuses to give change for the vending machine or to sell tobacco products to the underage inspector, the underage inspector should leave the outlet without argument.
14. When leaving the outlet, do not let the clerk be aware that you and the underage inspector are together.
15. **Complete the data collection form in its entirety after leaving each outlet.** Bring a pen or pencil. *Please note that the current Synar survey form has two categories of reasons for why an outlet was not able to be completed: 1) one category was for an outlet that is considered **ineligible**; and 2) the second was for an outlet that **was eligible, but for some legitimate reason the inspection could not be completed.***
16. Collect all completed survey report forms and mail the original forms to the PIHP or their designee for your region.
17. Do not discuss the surveys with others until all the surveys/compliance checks are completed.
18. Record mileage for reimbursement (if allowed).

*Note: Timeline adjustments may be made per MDHHS communication as deemed necessary to align with printing and reporting schedules

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