

**USDA** Country of Origin Labeling



**Retail Review Procedures**

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**USDA** Conducting Retail Review



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**USDA** 3 Step Process

**Step 1:** Review all COOL guidance documents and prepare the Workbook.

**Step 2:** Conduct COOL Surveillance Review at the retail establishment.

- **Part A:** Opening Meeting
- **Part B:** Conduct Review
- **Part C:** Recordkeeping (Follow-up reviews only)
- **Part D:** Closing Meeting

**Step 3:** Submit Workbook to USDA COOL Division.

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**Step 1:**  
**Review COOL Requirements and  
Prepare Workbook**

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**Refresh Your Skills**

**Do Your Homework!** 

- Review:
  - ✓ Final Rule, 7 CFR Parts 60 and 65
  - ✓ 7 CFR Final Rule and amendments published:
    - January 15, 2009
    - May 23, 2013
    - March 2, 2016

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**Refresh Your Skills (cont.)**

- Review :
  - ✓ NC Codes that apply to the Retail Review (Initial or Follow-up) being conducted.
  - ✓ Previous Year's Workbook and retailer response, if review is a follow-up. Previous year's workbook must be reviewed to verify retailer has corrected all findings identified.

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## Training Materials

- All COOL training materials will be posted to the COOL website:  
[www.ams.usda.gov/cool](http://www.ams.usda.gov/cool)  
 Education & Training

<b>Country of Origin Labeling (COOL)</b> Overview Packed Honey COOL Questions & Answers <b>Education &amp; Training</b> Compliance & Enforcement	<b>Education &amp; Training</b> • Letter to Industry from April 5, 2012 <b>COOL Outreach Brochures</b> • Consumer (pdf) • Retailer (pdf) • Supplier (pdf)	<b>News &amp; Announcements</b> • 02/29 USDA Amends Country of Origin Labeling Requirements, Final Rule Repeals Beef and Pork Requirements • 12/18 Statement from Agriculture Secretary Tom Vilsack on the Country of Origin Labeling Requirements for
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## Download Workbook

- COOL Initial and Follow-up retail review workbook will be posted to the COOL website:  
[www.ams.usda.gov/cool](http://www.ams.usda.gov/cool)  
 Forms

<b>Country of Origin Labeling (COOL)</b> Overview Packed Honey COOL Questions & Answers Education & Training Compliance & Enforcement Other Federal Agency Rulings Related to COOL <b>Forms</b>	<b>COOL Forms</b> • 2016 COOL Workbook for Follow Up Reviews (xls) • 2016 COOL Initial Retail Review Workbook (xls) • View and update the COOL, Corporate Contact Designation Form • View the COOL Request for Reimbursement (state agencies only) Form -- SF-270 (pdf)	<b>News &amp; Announcements</b> • 05/23 USDA Seeks Nominees for United Sorghum Checkoff Program Board • 05/16 USDA Seeks Nominees for American Lamb Board • 05/15 USDA Proposes to Amend the Beef Promotion and Research Order; Invites Public Comments
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## Workbook Overview

- Both the Initial and Follow-up Workbook (Excel) contain two (2) tabs:
  - Information Form** – includes summary of regulatory requirements and possible findings.
  - Checklist** – includes findings (and recordkeeping, if applicable)

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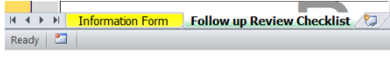
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**USDA** **Workbook Overview – Checklist Tab**

- Initial Review Checklist



- Follow-up Review Checklist



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**USDA** **Workbook Overview – Checklist Tab**

**Information entered in the Review Checklist tab will automatically populate in the Information Form.**

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**USDA** **Initial Retail Review Workbook**

		Country of Origin Labeling 1400 Independence Avenue, SW. Room 2628-5, STOP 0216 Washington, DC 20258-0216		Spell Check Checklist
Country of Origin Labeling (COOL) Retail Surveillance Initial Review Checklist				
Review Number		Reviewer's Name		
Date Reviewed		Reviewer's Email		
Store Name		Reviewer's Phone Number		
Store ID Number		Store Representative		
Physical Address		Responsible Authority's Name		
City, State ZIP		Responsible Authority's Position		
Store Phone Number		Responsible Authority's Email		
Corporate Contact Email		Findings Identified?		

This review is conducted in accordance with the requirements contained in the Mandatory Country of Origin Labeling Final Rule Title 7 CFR Part 60 and 65, as amended through March 2, 2016. The results of this review are not official until reviewed by the COOL Division Director.

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## Follow-up Retail Review Workbook

	Country of Origin Labeling Division	1400 Independence Avenue, SW, Room 2020-9, STOP 0216 Washington, DC 20250-9216	Spell Check	Checklist
March 22, 2016				
<b>Country of Origin Labeling (COOL) Retail Surveillance Follow up Review Checklist</b>				
Review Number		Reviewer's Name		
Date Reviewed		Reviewer's Email		
Store Name		Reviewer's Phone Number		
Store ID Number		Store Representative		
Physical Address		Responsible Authority's Name		
City, State ZIP		Responsible Authority's Position		
Store Phone Number		Responsible Authority's Email		
Corporate Contact Email		Findings Identified?		

*This review is conducted in accordance with the requirements contained in the Mandatory Country of Origin Labeling Final Rule Title 7 CFR Part 69 and 85, as amended through March 2, 2016. The results of this review are not official until reviewed by the COOL Division Director.*

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## Prepare Workbook

- The retail store assignment list provides the following:
  - Review Number (i.e., AZ 16 F0245 or FL 16 N1023)
  - Retailer Name, Address, and Phone Number
- Type this information in the top portion of the workbook.
- Also type your name and contact information.
- Save

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## Workbook File Name

- Save workbook with the file name assigned by COOL that will include the following:
  - ✓ State Initials (TX)
  - ✓ Fiscal Year (16)
  - ✓ Review Number – 4 digit (9867)

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## Initial Retail Review File Name

Initial Retail Reviews will include an “N” before the 4 digit number in the file name. This indicates store location was not reviewed the previous year.

**Example:** AL 16 N0351

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## Follow-up Retail Review File Name

Follow-up Retail Reviews will include an “F” before the 4 digit number in the file name. This indicates store location was reviewed previously and results warranted another review.

**Example:** TX 16 F9867

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**Step 1 -Complete**

## Review COOL Requirements and Prepare Workbook

	Agricultural Marketing Service Country of Origin Labeling Division	1400 Independence Avenue, SW. Room 2020-S, 810P 6216 Washington, DC 20250-2216	Spell Check	Checked March 22, 2016
<b>Country of Origin Labeling (COOL) Retail Surveillance Follow up Review Checklist</b>				
Review Number	UT 16 F2344	Reviewer's Name	John Doe	
Date Reviewed	9/1/2016	Reviewer's Email	jdoe@usda.gov	
Store Name	ABC Retailer	Reviewer's Phone Number	(202) 720-8846	
Store ID Number	123	Store Representative		
Physical Address	50 Main Street	Responsible Authority's Name		
City, State ZIP	Salt Lake City, Utah 84103	Responsible Authority's Position		
Store Phone Number	(111) 222-3333	Responsible Authority's Email		
Corporate Contact Email		Findings Identified?		

This review is conducted in accordance with the requirements contained in the Mandatory Country of Origin Labeling Final Rule Title 7 CFR Part 69 and 65, as amended through March 2, 2016. The results of this review are not official until reviewed by the COOL Division Director.

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**Step 2:  
Conduct Retail Surveillance  
Review**

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**USDA Recommendation**

**New Reviewers are encouraged  
to shadow an experienced  
reviewer at least once.**

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**Step 2 – Conducting  
Review**

- **Part A:** Opening Meeting
- **Part B:** Conduct Review
- **Part C:** Recordkeeping (Follow-up reviews only)
- **Part D:** Closing Meeting

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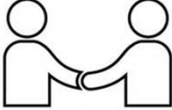
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**Step 2:**  
**Part A: Opening Meeting**




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**Part A: Opening Meeting**

Upon arrival at the retail store, the reviewer shall:

- Introduce themselves as a representative of USDA with an official picture identification.
- Request a meeting with the store manager, counter manager, or other appropriate official

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**Part A: Opening Meeting**

Conduct a short meeting with the responsible authority.

- Explain the scope and objective of the review.
- Provide a short summary of what you will be looking for by providing a copy of the **Information Sheet**

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## Part A: Opening Meeting

The **Information Sheet** will provide a summary of regulatory requirements, types of findings, and COOL Division contact information.

USDA		Country of Origin Labeling (COOL) - Final Rule	
Section	Page	Section	Page
Introduction	1	Labeling Requirements	10
Labeling Requirements	10	Record Keeping Requirements	14
Labeling Exemptions	11	Types of Findings	15
Labeling Procedures	12	Appendix 1 - Labeling for COOL	16
Labeling for COOL	13	Appendix 2 - Labeling for COOL	17
Labeling for COOL	14	Appendix 3 - Labeling for COOL	18
Labeling for COOL	15	Appendix 4 - Labeling for COOL	19
Labeling for COOL	16	Appendix 5 - Labeling for COOL	20
Labeling for COOL	17	Appendix 6 - Labeling for COOL	21
Labeling for COOL	18	Appendix 7 - Labeling for COOL	22
Labeling for COOL	19	Appendix 8 - Labeling for COOL	23
Labeling for COOL	20	Appendix 9 - Labeling for COOL	24
Labeling for COOL	21	Appendix 10 - Labeling for COOL	25

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## Part A – Opening Meeting

### Follow-up Review

If a follow-up review is being conducted, advise responsible authority of the following:

- Records will be requested during the retail review.
- The items selected for records are chosen at random.
- Records can be maintained at the retail store or in a remote location.
- If needed retailer has 5 business days to provide records.

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## Part A: Opening Meeting

### Follow-up Review

Advise Responsible Authority:

- A follow-up review is being conducted because of previous noncompliance’s observed. Note: If the retailer failed to respond to the previous findings, inform them they are responsible for responding to the noncompliance letter mailed by USDA.

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## Warning!

- Do not confront an angry, belligerent or non-cooperative facility representative!!
- If the facility representative refuses to cooperate with the review, contact your state COOL Manager with the information.

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## Store Closed

If the store is closed upon arrival:

- Take a picture of the front of the store.
- Submit the workbook with the File Name, Date Reviewed, Store Information, and Reviewer's Information.
- Select "Store Closed" in the "Finding Identified?" field.
- In the Comments section, describe store was closed upon arrival.

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## Store Closed: Submit Workbook

USDA Agricultural Marketing Service | Country of Origin Labeling Division | 1400 Independence Avenue, SW Room 2820-S, STOP 0216 Washington, DC 20250-0216 | Spell Check | Checklist | March 9, 2016

Country of Origin Labeling (COOL) Retail Surveillance Follow up Review Checklist			
Review Number	UT 16 F2344A	Reviewer's Name	John Doe
Date Reviewed	3/3/2016	Reviewer's Email	<a href="mailto:j.doe@dc.gov">j.doe@dc.gov</a>
Store Name	BCA Retailer	Reviewer's Phone Number	(202) 720-8846
Store ID Number	321	Store Representative	
Physical Address	50 Main Street	Responsible Authority's Name	
City, State ZIP	Salt Lake City, Utah 84103	Responsible Authority's Position	
Store Phone Number	(111) 222-3333	Responsible Authority's Email	
Corporate Contact Email		Findings Identified?	Store Closed

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 **Retailer Changed Ownership**

If the store changed ownership or name:

- Take a picture of the front of the store, if review is a follow-up review.
- Ask Responsible Authority the details of the store name change (i.e., When did ownership change?).
- In the Comments section, record the details provided by the responsible authority.
- Proceed to conduct the review.

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 **Part A: Opening Meeting**

- Ask responsible authority to verify the store name, address, and phone information are correct.
- Request:
  - Store Representative Name
  - Responsible Authority Name
  - Corporate Contact E-mail (if any)
  - Responsible Authority's Store E-mail Address (if any)

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 **Part A: Opening Meeting**

**Answer Questions**

- Answer any questions pertaining to the review or the COOL regulation.
- Inform the store representative that they are welcome to accompany you during the review.

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### Part A: Opening Meeting

#### Answer Questions

- Ask store representative who you should request records from (i.e., meat manager)
- Confirm the time and place for the closing meeting.
- Findings of non-compliance are considered unofficial until evaluated by USDA.

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**Step 2:**  
**Part B: Conduct Initial Review**

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**Part B: Conduct Review**  
**Initial Review**

- COOL Reviewers will document non-complying items and their NC code(s) in the appropriate initial review workbook.
- Initial reviews contain 6 commodity categories for which the reviewer must document non-complying items.

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**USDA** **Part B: Conduct Review**  
**Initial Review**

Review all 6 covered commodity categories:

- Produce Department (fresh and frozen fruits and vegetables; ginseng)
- Baking Aisle (nuts: raw peanuts, pecans, macadamia nuts)
- Meat Department (fresh and frozen lamb, goat, chicken)
- Seafood Department (fresh and frozen fish and shellfish)

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**USDA** **Part B: Conduct Review**  
**Initial Review**

Including all locations:

- Full-service counters
- Frozen items display cases
- Self-service areas, sale counters and promotional displays



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**USDA** **Part B: Conduct Review**  
**Initial Review**

**Not Sold In Store**

- If no commodities were present in a given section, apply an X in the “Not sold in store” field.

Number of Items Reviewed		Nuts & Ginseng		Not sold in store
		NC Codes	Notes	X
Non-Complying Item(s)				
1				
2				
3				
4				
5				
6				
7				

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### Part B: Conduct Review Initial Review

**Enter Number of Items Reviewed.** This is the total number of commodities reviewed for the section.

**Example:** Retail store sold Gala apples, Fiji apples, Granny Smith apples, and Red Delicious apples in the fruit section. A total of 4 items reviewed will be recorded in the fruits section.

Number of Items Reviewed	4	Fruits		Not sold in store
Non-Complying Item(s)	NC Codes	Notes		
1 Gala Apples	1			
2				
3				

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### Part B: Conduct Review Initial Review

#### Record Findings

The more information the better!

- Gala Apples, sold in bulk
- Oranges, 5 lb bags
- Frozen Dole Strawberries, 1.5 lb best by 8/2010
- Previously Frozen Whole Salmon in Fresh Cooler

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### Part B: Conduct Review Initial Review

#### Record Findings

- Describe the item in the non-complying items(s) column of the workbook.
- Record the applicable NC code(s).
- **Reminder:** There may be more than one NC code per item.

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**USDA** **Part B: Conduct Review**  
**Initial Review**

**Record Findings**

- Further clarification is required for all NC codes except 1 and 6.
- Example:
  - NC code 3: Store label states USA; however, PLU sticker states Peru.
  - NC code 4b: Packaged stated grown in Big Valley Farm.
  - NC code 4c: Fresh meat display sign stated "Product of USA." No production step.

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**USDA** **Part B: Conduct Review**  
**Initial Review**

**Entering Non-Compliances in Checklist**

- Enter all non-compliance information into the Workbook on the Checklist tab in the appropriate commodity sections.
- Be sure to be descriptive as you are our "eyes and ears".

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**USDA** **Part B: Conduct Review**  
**Initial Review**

**Entering Non-Compliances in Checklist**

- Capitalize 1<sup>st</sup> letter of item's name.
- Select correct NC code(s).
- Provide notes describing the NC(s).

Number of Items Reviewed		Vegetables		Not sold in store
Non-Complying Item(s)		NC Codes	Notes	
1	Jalapeno Peppers	3	Store sign states Mexico; however, PLU sticker states USA.	
2				
3				
4				
5				
6				
7				

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**USDA** **Part B: Conduct Review**  
**Initial Review**

**Entering Non-Compliances in Checklist**

- Use proper spelling, grammar, and punctuation.
- Include as much information as possible (brand name, pack size, etc.) so the retailer knows which items to address.

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**USDA** **Part B: Conduct Review**  
**Initial Review**

**Entering Non-Compliances in Checklist**

- If you need additional space use the Additional Item page.

Additional Items			
	Non-Complying Item(s)	NC Codes	Notes
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			

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**USDA** **Part B – Numerous Items**

- There are instances when so many items are found to be non-compliant, it is not necessary to list each one.
- Record in appropriate commodity section.
- Group items with different NC codes separately.

Number of Items Reviewed		Fruits		Not sold in store
	Non-Complying Item(s)	NC Codes	Notes	
1	12 Fresh Fruit sold in bulk	1		
2	14 Fresh Fruit sold in bulk	5	Various countries of origin were abbreviated.	
3				
4				
5				

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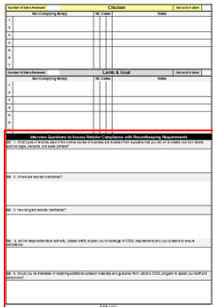

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**USDA** **Part B: Conduct Review**  
**Initial Review**

**Interview Questions**

- Interview questions are located toward the end of page 3 of the initial review workbook.

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**USDA** **Part B: Conduct Review**  
**Initial Review**

**Interview Questions**

- Interview questions assess retailer's recordkeeping compliance.
- Interview questions must be completed at the time the initial review is conducted.
- Reviewer can provide interview questions during opening or closing meeting.

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**USDA**

**Step 2:**  
**Part B: Conduct Follow-up Review**

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**USDA** **Part B: Conduct Review**  
**Follow-up Review**

- COOL Reviewers will document non-complying items and their NC code(s) in the appropriate follow-up review workbook.
- Follow-up reviews contain 6 labeling non-compliance commodity categories 6 recordkeeping sections.

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**USDA** **Part B: Conduct Review**  
**Follow-up Review**

Review all 6 covered commodity categories:

- Produce Department (fresh and frozen fruits and vegetables; ginseng)
- Baking Aisle (nuts: raw peanuts, pecans, macadamia nuts)
- Meat Department (fresh and frozen lamb, goat, chicken)
- Seafood Department (fresh and frozen fish and shellfish)

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**USDA** **Part B: Conduct Review**  
**Follow-up Review**

Including all locations:

- Full-service counters
- Frozen items display cases
- Self-service areas, sale counters and promotional displays



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**USDA** Part B: Conduct Review  
**Follow-up Review**

**Record Findings**  
The more information the better!

- Bartlett Pears, sold in bulk
- Navel Oranges, 5 lb bags
- Frozen Dole Mango Chunks, 1.5 lb best by 8/2010
- Previously Frozen Whole Catfish in Fresh Cooler

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**USDA** Part B: Conduct Review  
**Follow-up Review**

**Record Findings**

- Describe the item in the non-complying items(s) column of the workbook.
- Record the applicable NC code(s).
- **Reminder:** There may be more than one NC code per item.

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**USDA** Part B: Conduct Review  
**Follow-up Review**

**Record Findings**

- Further clarification is required for all NC codes except 1 and 6.

**Example:**

- NC code 13: Invoice record does not identify the supplier name, city and state.
- NC code 14: Store sign states USA; however, invoice record states Mexico.
- NC code 15: Store sign states Wild Caught; however, delivery slip and master container state Farm-Raised.

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**USDA** Part B: Conduct Review  
**Follow-up Review**

**Pictures of all non-compliances and recordkeeping item observed in store are required for follow-up reviews ONLY.**

\*Do not submit pictures of records (e.g., invoice, BOL, etc.)



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**USDA** Part B: Conduct Review  
**Follow-up Review**

- Pictures will be submitted with workbook once Follow-up Review is completed.



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**USDA** Part B: Conduct Review  
**Follow-up Review**

- Make every effort to provide pictures that are clear and legible.
- If necessary, take multiple pictures to properly record the non-compliance.

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**USDA Part B: Conduct Review Follow-up Review**

**Example:** Three pictures were provided for the pineapple. The store sign states USA as the country of origin; however, the back of the tag states Panama and the front of the tag states Honduras.

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**USDA Part B: Conduct Review Follow-up Review**

**Entering Non-Compliances in Checklist**

- If no commodities were present in a given section, apply an X in the “Not sold in store” field.

Number of Items Reviewed	Nuts & Ginseng		Not sold in store
Non-Complying Item(s)	NC Codes	Notes	
1			X
2			
3			
4			
5			
6			
7			

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**USDA Part B: Conduct Review Follow-up Review**

**Enter Number of Items Reviewed.** This is the total number of commodities reviewed for the section.

**Example:** Retail store sold Gala apples, Fiji apples, Granny Smith apples, and Red Delicious apples in the fruit section. A total of 4 items reviewed will be recorded in the fruits section.

Number of Items Reviewed	Fruits		Not sold in store
Non-Complying Item(s)	NC Codes	Notes	
1			
2			
3			
4			

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### Part B: Conduct Review Follow-up Review

#### Entering Non-Compliances in Checklist

- Enter all non-compliance information into the Workbook on the Checklist tab in the appropriate commodity sections.
- Be sure to be descriptive as you are our “eyes and ears”.

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### Part B: Conduct Review Follow-up Review

#### Entering Non-Compliances in Checklist

- Capitalize 1<sup>st</sup> letter of item’s name.
- Select correct NC code(s).
- Provide notes describing the NC(s).

Number of Items Reviewed	50	Vegetables		Not sold in store
	Non-Complying Item(s)	NC Codes	Notes	
1	Jalapeno Peppers	3	Store sign states Mexico; however, PLU sticker states USA.	
2				
3				
4				
5				
6				
7				

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### Part B: Conduct Review Follow-up Review

#### Entering Non-Compliances in Checklist

- Use proper spelling, grammar, and punctuation.
- Include as much information as possible (brand name, pack size, etc.) so the retailer knows which items to address.

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**USDA** **Part B: Conduct Review**  
**Follow-up Review**

**Entering Non-Compliances in Checklist**

- If you need additional space use the Additional Item page.

Additional Items		Notes	
Non-Complying Item(s)	NC Codes		
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			

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**USDA** **Part B – Numerous Items**

- There are instances when so many items are found to be non-compliant, it is not necessary to list each one.
- Record in appropriate commodity section.
- Group items with different NC codes separately.

Number of Items Reviewed	Item	Fruits		Not sold in store
	Non-Complying Item(s)	NC Codes	Notes	
1	12 Fresh Fruit sold in bulk	1		
2	14 Fresh Fruit sold in bulk	5	Various countries of origin were abbreviated.	
3				
4				
5				

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**USDA** **Part B: Conduct Review**  
**Follow-up Review**

- Record any recordkeeping non-compliances as described in the Recordkeeping Procedures training course.

Additional Items		Notes	
Non-Complying Item(s)	NC Codes		
1	Whole Broiler Chicken	13	Invoice record did not include the supplier name, city, and state.
2			
3			
4			
5			
6			
7			

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**Step 2:**  
**Part C: Recordkeeping (Applies to Follow-up reviews only)**

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 **Part C: Conduct Review**  
**Follow-up Review**

**For fiscal year 2016 recordkeeping information will be collected for all 6 commodity categories.**



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 **Part C: Conduct Review**  
**Follow-up Review**

**Records will be requested during the retail review.**



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**USDA** **Part C: Conduct Review**  
**Follow-up Review**

The Recordkeeping Procedures section of training will describe the methods used to collect records and how to record non-compliances.

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**USDA**

How should a Reviewer handle non-compliances corrected during the retail review?




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**USDA** **Non-compliances Corrected During the Review**

- All non-compliances observed by the Reviewer **must** be reported to USDA even if they are corrected right away.
- Reviewer may include a note in the "Additional Comments and Information"

**Example:** "All fruit items with NC code 1 findings were corrected prior to leaving store."

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**USDA**

**Step 2:**  
**Part D: Closing Meeting**




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**USDA**

**Part D – Closing Meeting**

- Provide Responsible Authority a copy of the completed Checklist;
- Discuss the results of the review and any findings identified;
- Verify name of Responsible Authority, email address, mailing address and phone number;

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**USDA**

**Part D – Closing Meeting**

- Inform the Responsible Authority **Findings are not official until reviewed by USDA;**
- If store received 4 or more noncompliance codes they will receive official notification from USDA requiring a response with corrective actions and preventative measures

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### Part D – Closing Meeting

Provide the Responsible Authority:

- Your contact information in case they have questions, and
- If a Follow-up Review was conducted, provide Records Request Form in case any records were pending to be submitted.

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### Records Request Form

Records Request Form will include:

- Item name for which records are being requested.
- Description of records required.
- Reviewer Contact information (Name, fax #, and e-mail).

**COOL Retail Records Request Form**

For filing records for Country of Origin Labeling (COOL) in RWT, participants have steps:

**Step 1:** For each file listed in the following table, please provide an original, CD, and/or a copy of the file to the reviewer within **10 business days**.

File Name	Date Recd
1	
2	
3	
4	
5	

**Step 2:** Identify the information that must be included on the record.

- The **FILE NAME** and **DATE RECEIVED** must be included for every individual record of steps 1 and 2.
- The **FILE NAME** and **DATE RECEIVED** must be clearly legible and must include the reviewer's name and contact information.

**Step 3:** Submit records via e-mail or fax to the contact below. **Business is held in the name.**

Reviewer's Name: \_\_\_\_\_  
 Fax Number: \_\_\_\_\_  
 E-mail: \_\_\_\_\_  
 Thank You!

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### Step 2 - Complete

- Thank the Responsible Authority for their time and attention.




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**Step 3:**  
**Submit Workbook and Pictures (when applicable) to USDA COOL Division. Pictures are only required for follow-up reviews.**

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**Step 3 – Post Review**

- Enter all non-compliances into the workbook checklist as well as the recordkeeping information.
- Enter Yes or No in the “Findings Identified?” field.
- Click “Spell Check” and make any necessary corrections.

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**Step 3 – Comments Section**

- The comment section will not print. It will only be viewed in excel file.
- Area to explain an issue or note pertinent information that COOL Specialists may need.
- Note if a whole group of covered commodities are not available.

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**USDA**

### Step 3– Comments Section

#### Follow-up Review

- If conducting a follow-up review, record whether or not previous findings were corrected.
- Make notation if store information has changed.

Questions? Contact the COOL Division at (202) 720-4486

The store ownership has changed since the last review (change effective 7/15/14). The previous store's name was HomeTown USA; however, the current store's name is Joe's Produce. This store sells only fruits and vegetables; therefore, only two items were chosen for records review. The non-complying items were corrected during the review. The bulk items cited on the 2014 review were again found to be non-compliant, but the store-packaged items were properly labeled this time.

Comments:

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**USDA**

### Step 3: Saving Pictures

#### Follow-up Review

- Pictures **must** be combined and saved in PDF or Word format.
- The picture file must be saved with the appropriate file name.

**Example:** NY 15 F3941A Pictures

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**USDA**

### Step 3: Saving Pictures

#### Follow-up Review

- Do not include more than 4 pictures per page.
- Pictures must be organized in the order they are listed in the workbook.

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 **USDA Recommendation**

**Once Workbook and Pictures are complete, State Managers are encouraged to evaluate workbooks prior to submitting to USDA**

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 **Step 3 – Submit Workbook and Pictures**

**Important: 2016 Follow-up Reviews and pictures will be submitted using Cloud Vault.**

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 **Step 3: Cloud Vault**

- State Managers will receive two (2) emails directly from the COOL Division.
- Both emails will contain a hyperlink to access 2 separate folders in Cloud Vault.

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**USDA** **Step 3: First Cloud Vault Email**

- First email will include a hyperlink that contains **previous year's reviews**.

Email #1 subject is "**2015 Reviews - New York**". Your state name will appear instead of NY.

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**USDA** **Step 3: Second Cloud Vault Email**

- Second email will include a hyperlink to **upload 2016 Follow-up Reviews**.

Email #2 subject is "**2016 NE Region - Submit Reviews HERE**". Your Region will appear instead of NE.

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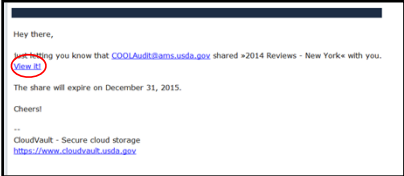
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**USDA** **Step 3: Access Cloud Vault**

- To access folder:
  - Click on the "View it!" hyperlink, or
  - Right click > Copy Hyperlink > Paste in IE, Google Chrome, Safari, or Firefox.



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**USDA** **Step 3: Access Cloud Vault**

**Caution:** When using Cloud Vault you may have limited access using Internet Explorer (IE); however, you can use Google Chrome, Safari, or Firefox.

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**USDA** **Step 3: Begin Upload**

1. Click on arrow (↑)



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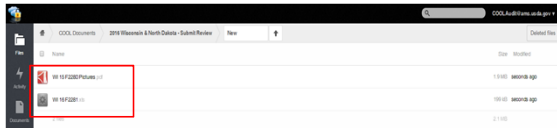
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**USDA** **Step 3: Begin Upload**

2. Select workbook and picture file from your computer. Note: You can also drag and drop!

3. Workbook will appear on Cloud Vault. You can open files by clicking on the file name.



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**USDA**  **Step 3 - Complete**



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**USDA** **Recap: 3-Step Procedure**

Step 1 – From the Office	
Guidance, Procedures, and Previous Year's Review Documents	Prepare Workbook

↓

Step 2 – At the Retail Store	
Gather Labeling Compliance Info	Recordkeeping Assessment (Follow-up Review)

↓

Step 3 – From the Office	
Complete Workbook	Submit Workbook & Pictures via Cloud Vault

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**USDA** **Initial Retail Review**

- Preparation for Review**
  - Review COOL Regulation and Retail Review Procedures
  - Prepare your Workbook
- Conduct Review**
  - Opening Meeting
  - Review all 6 commodity categories for labeling non-compliances
  - Closing Meeting
- Submit Review**
  - Complete workbook by entering any findings identified and answers to the 5 Interview Questions .
  - Submit Workbook to USDA

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## Follow-up Retail Review

**Preparation for Review**

- Review COOL Regulation and Retail Review Procedures
- Prepare your Workbook

**Conduct Review**

- Opening Meeting
- Review all 6 commodity categories for labeling non-compliances
- Take pictures of all non-compliances
- Request recordkeeping information
- Closing Meeting

**Submit Review**

- Complete workbook by entering any recordkeeping information submitted within the 5 business days.
- Organize and consolidate pictures in one file
- Submit Workbook to USDA

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## What is Wrong?

	Agricultural Marketing Service	Country of Origin Labeling Division	1400 Independence Avenue, SW Room 2620-S, STOP 0216 Washington, DC 20250-0216	Spell Check	Checklist March 9, 2016
<b>Country of Origin Labeling (COOL) Retail Surveillance Follow up Review Checklist</b>					
Review Number	DC 16 F234	Reviewer's Name	FRANK		
Date Reviewed	4/11/2016	Reviewer's Email	FRANK@SMITH2.com		
Store Name	BOBS MARKET	Reviewer's Phone Number	(202) 567-0987		
Store ID Number		Store Representative	DAVID JONES		
Physical Address	1 MAIN STREET	Responsible Authority's Name	BOB JONES		
City, State ZIP	WASHINGTON, D. C. 20005	Responsible Authority's Position	MANAGER		
Store Phone Number	(202) 332-4030	Responsible Authority's Email	bobjones@bmarket.com		
Corporate Contact Email		Findings Identified?			

This review is conducted in accordance with the requirements contained in the Mandatory Country of Origin Labeling Final Rule Title 7 CFR Part 60 and 65, as amended through March 2, 2016.  
The results of this review are not official until reviewed by the COOL Division Director.

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## What is Wrong?

	Agricultural Marketing Service	Country of Origin Labeling Division	1400 Independence Avenue, SW Room 2620-S, STOP 0216 Washington, DC 20250-0216	Spell Check	Checklist March 9, 2016
<b>Country of Origin Labeling (COOL) Retail Surveillance Follow up Review Checklist</b>					
Review Number	DC16N2525B	Reviewer's Name			
Date Reviewed	4/15/2016	Reviewer's Email			
Store Name		Reviewer's Phone Number			
Store ID Number	Murry's	Store Representative	William O'Henney		
Physical Address	769 H Street NE	Responsible Authority's Name	Mr. William		
City, State ZIP	Washington, D. C. 20004	Responsible Authority's Position	General Manager		
Store Phone Number		Responsible Authority's Email			
Corporate Contact Email		Findings Identified?	<b>No</b>		

This review is conducted in accordance with the requirements contained in the Mandatory Country of Origin Labeling Final Rule Title 7 CFR Part 60 and 65, as amended through March 2, 2016.  
The results of this review are not official until reviewed by the COOL Division Director.

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# What is Wrong?

USDA Agricultural Marketing Service	Country of Origin Labeling Division	1400 Independence Avenue, SW Room 2620 S, STOP 0216 Washington, DC 20250-0216	Spell Check	Checklist
Country of Origin Labeling (COOL) Retail Surveillance Follow up Review Checklist				
Review Number	Reviewer's Name			
Date Reviewed	Reviewer's Email			
Store Name	Reviewer's Phone Number			
Store ID Number	Store Representative			
Physical Address	Responsible Authority's Name			
City, State, ZIP	Responsible Authority's Position			
Store Phone Number	Responsible Authority's Email			
Corporate Contact Email	Findings Identified?		Store Closed	

This review is conducted in accordance with the requirements contained in the Mandatory Country of Origin Labeling Final Rule Title 7 CFR Part 60 and 65, as amended through March 2, 2016. The results of this review are not official until reviewed by the COOL Division Director.

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# What is Wrong?

Number of Items Reviewed	Fruits			Not sold in store
Non-Complying Item(s)	NC Codes		Notes	
1 Corn	1			
2 Mangos	3			
3				
4				
5				
6				
7				

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# What is Wrong?

Number of Items Reviewed	Chicken			Not sold in store
Non-Complying Item(s)	NC Codes		Notes	
1 Chicken 8oz. Breast	4c			
2				
3				
4				
5				
6				
7				

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### What is Wrong?

Number of Items Reviewed	18	Fish & Shellfish		Not sold in store
Non-Complying Item(s)	NC Codes	Notes		
1 Fresh Salmon Fillet	1	Production Steps not stated on item.		
2				
3				
4				
5				
6				
7				

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### What is Wrong?

Number of Items Reviewed	9	Lamb & Goat		Not sold in store
Non-Complying Item(s)	NC Codes	Notes		
1 Lamb Roast	4c	Method of Production not stated.		
2				
3				
4				
5				
6				
7				

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### Questions?



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