

Operating Alcohol Age Compliance Checks in Wisconsin

“Increasing enforcement against retailers who sell to minors can have a substantial effect on alcohol sales to young people. Even moderate increases in enforcement can reduce sales to minors by as much as 35 percent to 40 per cent, especially when combined with media and other community activities.”

Reducing Underage Drinking: A Collective Responsibility, National Research Council Institute of Medicine, 2004

Alcohol is perhaps the most regulated substance in the world with a history of organized regulation stretching back thousands of years. Every state and the District of Columbia has adopted age 21 as the minimum legal drinking age with a limited number of narrow exceptions. Alcohol retailers are expected to respect and enforce the law as required by their specific licensing. Of course, accountability improves compliance in all aspects of human behavior. The National Academies of Science Committee on Developing a Strategy to Reduce and Prevent Underage Drinking found an impressive body of research resulting from years of studies showing that alcohol age compliance checks reduce alcohol sales to youth.¹

Alcohol age compliance checks are widely, but not universally, used in Wisconsin to reduce youth access to alcohol. Communities adopting a comprehensive approach to preventing and reducing underage drinking often pair age compliance checks with efforts to reduce non-commercial (social) access to alcohol such as social host ordinances.

Recent changes in federal funding and priorities compelled some communities to reconsider the value and goals of alcohol age compliance checks. Extensive research leaves little doubt that alcohol age compliance checks are an important part of the community alcohol control efforts, especially efforts to prevent and reduce underage drinking.

Research shows that the impact of age compliance checks diminishes as early as two weeks after an enforcement action and the deterrent effect has largely disappeared after three months.² A constantly changing group of teens and high levels of turnover among retail requires ongoing employee education efforts and vigilance is needed to keep compliance rates in acceptable ranges.

Alcohol Age Compliance Checks – Enforcing Existing Law

Compliance checks should be part of the community effort to prevent and reduce underage drinking, as a proven strategy to reduce commercial access to alcohol among youth for several reasons:

- 1) Selling alcohol to anyone under age 21 is clearly illegal – there are no grey areas when a solid protocol is used. The community enforces alcohol related laws, community expectations are clear.
- 2) Studies consistently show alcohol age compliance checks reduce alcohol sales to underage individuals.

Alcohol age compliance checks are often the first step in community efforts to improve the alcohol environment. Alcohol age compliance checks support positive community expectations, reduce underage drinking by reducing youth access to alcohol while enforcing the widely accepted and respected minimum legal drinking age. While some retailers may balk, citizens expect retailers to respect the law and will support the effort if the goals and process is explained.

Wisconsin Experience

Because community safety, law enforcement and alcohol regulation are primarily local responsibilities in Wisconsin, materials prepared for states with statewide beverage control boards or alcohol control agencies often need modification before use in Wisconsin.

Experience shows compliance checks are most effective when: ³

- 1) scheduled to cover retailers at least twice a year
- 2) provide advance notification to retailers, they are not “stings”
- 3) use tested and effective protocols
- 4) build community support for compliance with the law
- 5) penalize the license holder when appropriate and not simply the clerk or server

Although overall rates of underage drinking in Wisconsin have recently fallen, our rate still exceeds the national average. Youth acquire alcohol through either commercial or noncommercial sources; younger teens and tweens pilfer alcohol from family and family friends while older teens (noncommercial sources) are likely to attempt alcohol purchases at off-premises (Class A) retailers, especially convenience stores or similar small retailers. While the patterns vary, vigilance and public safety suggest communities make every effort to sustain or initiate alcohol age compliance checks to achieve a deterrent effect.

Municipal Concerns

If your community does not conduct alcohol age compliance checks, it is important to learn why before taking action. Sometimes law enforcement is unaware the community supports enforcement of minimum legal drinking age laws. In other situations, the lack of compliance checks may be a political decision or simply a long standing tradition with a long forgotten rationale. Citizen involvement in a public discussion about underage drinking and where youth acquire alcohol may change the political view. Some communities have leveraged the Parents Who Host Lose the Most campaign with alcohol age compliance checks to help reduce both commercial and non-commercial (social) youth access to alcohol, an important step towards a comprehensive community plan.

Consistent vocal support from community residents has sometimes quieted retailer objections to age compliance checks. When local law enforcement and the governing body of the community knows residents support alcohol age compliance checks, the effort becomes a matter of public safety not retailer inconvenience. While people often pay lip service to the political power of alcohol interests in Wisconsin, the simple truth is that very few people actually want retailers to sell alcohol to youth. The minimum legal drinking age has proved to be a popular and effective law that has significantly reduce death and injury among teens.

Without federal funding, it is important for a community to consider local financial support for compliance checks. The federal Comprehensive Alcohol ReDuction (CARD) grants through DOT did not always cover the entire cost of the alcohol age compliance check operations, many grants were for \$5,000 or less. It is important to know to what extent, if any, the loss of federal funds impacted your ability to conduct alcohol age compliance checks. Even if federal funds were an important part of your local efforts, there are community options that may allow the operation to continue.

In Wisconsin, some coalitions perform aspects of the compliance check program that do not require a sworn officer. A list of potential civilian tasks is located in Appendix 1. Some communities used multi-jurisdictional task forces to create economies of scale. As a result of federal funding cuts, one multi-jurisdictional task force is experimenting with integrating age compliance checks into other operations. In short, when a community values alcohol age compliance checks, they look for the resources to continue them.

Early Planning

Most Wisconsin municipalities have adopted Chapter 125, the section of Wisconsin statutes on alcohol control, as part of their municipal ordinances enabling local law enforcement to issue civil citations for selling alcohol to underage customers. Local law enforcement or the municipal clerk can explain your municipality's policy.

Municipal citations provide an opportunity for retailer education or license conditions in lieu of other sanctions, an option that may be more beneficial to the community in the long run. If it becomes clear the licensee (as opposed to a retail clerk or server) is noncompliant, the licensee and not the clerk may be ticketed. By statute, only one offense may be prosecuted as a result of a single instance of selling alcohol to an underage individual. It is important to consider who will be cited and what sanctions will be applied in advance of any operation.

Before beginning compliance checks; the municipal judge (or judges in regional efforts) should be briefed on the purpose and operation of age compliance checks. Law enforcement can fill this role, but it is also appropriate for citizen groups (including a community coalition) to discuss the goals of alcohol age compliance checks and local underage drinking concerns in general terms, without mentioning a specific case.

It is important for municipal judges to understand that alcohol age compliance checks are not “sting” operations and that research shows compliance checks prevent underage drinking. Most judges are well aware of the problems caused by underage drinking as a result of the vandalism, theft and disorder concerns they see in their courtroom. On occasion, the failure to include the municipal judge in discussions has resulted in dismissed citations or reduced forfeitures by judges who were unaware of local underage drinking problems or failed to understand the goals of the operation.

Retailer Education Can't Replace Compliance Checks

Retailer efforts to educate employees on proper age verification procedures are good for both the retailer and the community. While some retailer education programs may appear similar to alcohol age compliance checks, these alcohol industry supported efforts can only complement police operations, but cannot replace them. Privately retained secret shoppers or actors impersonating underage customers attempting to purchase alcohol can be a valuable educational tool, but they can't replace a police operation.

Some of the industry education programs are limited to retailers who are clients of a specific wholesaler or who had agreed in advance to have their store monitored. There's no reason to discourage these operations but it is important for municipal leaders to understand they are not an effective substitute for alcohol age compliance checks. Alcohol is a legal regulated product, determining whether all licensed retailers are in compliance with minimum legal drinking laws is a municipal responsibility.

Operational Planning

Successful alcohol age compliance checks are operated by local police, Sheriffs' Departments or regional law enforcement task forces. Both Sheriffs and local police departments have successfully operated regional age compliance check operations under multi-jurisdictional agreements or a Memoranda of Understanding (MOU). Regional operations may achieve economies of scale and create a larger pool of youth decoys making a regional approach an attractive option for many communities.

The size of each team and how they are deployed varies even within Wisconsin. In general, each compliance check team consists of at least two youth decoys, and two adults. Some teams are composed of one sworn officer and one adult volunteer, while other Departments deploy two sworn officers. While some communities field one officer with two decoys, that approach leaves one decoy temporarily unsupervised for brief periods throughout the shift.

Only officers should drive from location to location. Adult volunteers may be required to pass a background check prior to participating in an operation. Departmental policies vary, but most limit adult volunteers to individual who have not had an alcohol related citation or offense. While some communities use teams that do not include an officer, the effectiveness of civilian/youth teams has not been established in Wisconsin.

Some Wisconsin coalitions recruit and train both adult and youth volunteers involved in alcohol age compliance checks, significantly reducing the amount of time law enforcement officers devote to the program. Community groups can also perform some of the administrative tasks that do not require a sworn officer reducing the overall cost of the program.

Making a community coalition an integral part of local alcohol age compliance checks benefits both the law enforcement agency and the coalition. The coalition participates in an effective evidence-based intervention and the law enforcement agency is able to implement age compliance checks without draining local resources.

Many community coalitions and Drug Free Community Grantees are members of the Wisconsin Alliance for Youth which encourages cooperation with local law enforcement. A listing of coalitions participating in the Wisconsin Alliance for Youth, by county, is located at: <http://www.allwisoyouth.org/alliances-by-county.php>.

Youth Decoys

Law enforcement has a ready source of trained youth volunteers (decoys) from the tobacco age compliance check Wisconsin "WINS" program. Youth too old to volunteer for tobacco age compliance checks (age 18) are at the right age to become decoys for alcohol age compliance checks. Some Wisconsin

communities recruit decoys from local Explorer Scout Posts or law enforcement students (cadets). Law enforcement agencies usually deploy decoys outside their neighborhood or community, reducing the chance a decoy will be recognized by retailers.

Youth decoys should not have any previous (non-traffic) citations or alcohol violations. If a youth receives an alcohol related citation after becoming a decoy, they are no longer credible decoys and their participation should end.

Prior to accepting a youth volunteer as a decoy, most law enforcement agencies conduct an internal review to determine that a reasonable person would believe the youth was younger than age 21. Young men with facial hair or young women who successfully use make-up to appear significantly older are not good choices for decoys.

Before the first operation, each youth decoy needs to provide the following:⁴

1. Signed parental permission slip
2. Signed waiver of department responsibility for injury or harm.
3. Emergency contact and health insurance information
4. Copy of birth certificate.

Some law enforcement agencies develop a written agreement between youth decoys and the Department which is signed by both parties prior to participation in any compliance check operations.

Agreements describe:

1. Exact duties and responsibilities of a decoy
2. Length and frequency of shifts
3. Any post citation responsibilities
4. Other specific expectations for youth volunteers at all times, such as not participating in or attending events where illegal underage drinking occurs

Youth are not generally compensated for participation, but some municipalities reimburse for travel costs or provide small incentives such as movie passes or pizza gift cards. In some communities, local restaurants and entertainment venues provide passes or meals to decoys as a public service receiving recognition for their community service.

All decoys should be photographed in the clothes they are wearing prior to each shift to document their appearance at the time of the operation. Digital cameras give Departments the ability to add the decoys photo to the computer record of the operation. Some Departments record the decoy's 0.00 BAC prior to the shift by administering a breath test.

As noted earlier there is some variation in the size and composition of teams, with some youth independently or in teams of two with an adult.⁵ Some agencies find youth are more comfortable working in pairs, because they are uncomfortable entering retailers alone. Having two youth on each team allows decoys to switch off serving as the buyer to reduce the impact of retailer telephone trees. Youth should be accompanied by a sworn officer who remains out of sight and, in some communities, a second adult, who may or may not be an officer.

Scheduling and Timing

The most effective alcohol age compliance checks are conducted systematically over a long period of time. Research and experience indicates age compliance checks need to be an ongoing police activity, much like speed control.

In Wisconsin alcohol age compliance checks generally operate using one of the two following patterns:

1. The law enforcement agency conducting the operation picks an extended period (two-weeks to one month) once or twice a year to conduct the compliance checks. The operation may move between neighborhoods and municipalities at any point during the announced time frame in response to vendor phone trees or community events.
2. Agencies schedule compliance checks throughout the year as resources allow, with the goal of checking the majority of licensees within the area.

While many communities want to check each licensed establishment at least once a year, monetary and manpower limitations may not allow the optimum number of checks. Because youth are most likely to attempt alcohol purchases at convenience stores and similar retail locations, some departments make Class A (off-premises) establishments the priority. Checks based on anonymous or citizen complaints are not recommended.⁶

Aggressive retailer telephone trees that alert other vendors to the presence of age compliance check operations are irritating but not an irresolvable problem. Heightened observance of the law by local retailers is deterrence in action. In most situations the compliance check team simply relocates to another part of the jurisdiction and multi-jurisdictional operations may simply proceed to another community after the first ticket is issued to complete the shift, leaving behind community retailers operating within the law.

In small jurisdictions, some Departments decide to write tickets after all the checks for that day are completed to prevent telephone tree alerts. In a small number of situations, officers return to write tickets the following day. The impact of these practices on the overall effectiveness of the operation is unknown.

Prior Notification

Most law enforcement agencies notify licensees in advance of the general time frame before initiating compliance checks. In Wisconsin, prior notification is generally made by first class letter to every license holder in the community, although some officers or Departments may also visit licensees as well. Prior notification reduces the appearance of a police “sting” blunting possible objections from local retailers and reinforcing the public perception that laws relating to alcohol sales are enforced. Some communities rely on media outreach to notify licensees know that alcohol age compliance checks are conducted throughout the year.

Some law enforcement agencies chose to limit age compliance checks to high risk occasions including; homecoming, prom and graduation. However, time targeted checks are unlikely to deter retailers the rest of the year.

A few law enforcement agencies chose not to make any prior notification and schedule age compliance checks throughout the year as perceived need and manpower allows. The deterrent effect of spontaneous and irregular checks is unknown, advance notification is generally recommended.⁷

Citations

Communities may consider the first round of alcohol age compliance checks a “survey” with written warnings issued to failing establishments and citations issued during subsequent checks. Communities may choose to cite either the license holder or the actual seller, but cannot prosecute both for a single violation. Most communities write citations against the seller, although research indicates that citations written against owners (licensee) are a more effective deterrent⁸.

Some communities initially ticket the seller/server selling alcohol to the decoy, but ticket the licensee for repeated sales to underage decoys. When a location is repeatedly cited for serving alcohol to underage customers, it is likely the owner has failed to take even minimal steps to avoid selling alcohol to youth. The City of La Crosse issues simultaneous citations were issued to both the server and the license holder with one ticket dismissed after investigation and prior to a court appearance. The intervening period allows the City to determine if the clerk or the licensee was at fault.

Decoy ID or No ID

In Wisconsin, many compliance check decoys attempt to purchase alcohol without presenting an ID. Decoys leave their personal IDs with the officer and are instructed to provide truthful responses to any questions asked by retailers, but not to initiate a conversation. If the retailer sells to the youth without seeing identification, a citation is issued.

Some protocols ask decoys to present their own ID when requested by retailers and a ticket is issued if the sale is completed. When an ID is not presented, it is impossible to determine if clerks would have examined an ID to ascertain birthdate and identity before a sale.

At least one Wisconsin community noticed a dramatic drop in the retailer compliance rates when the local protocol began to require decoys to present their (underage) identification as opposed to assuming compliance if identification was requested.⁹

Penalties and Sanctions

Alcohol age compliance checks are conducted to encourage compliance with minimum legal drinking age laws. To achieve that goal, many law enforcement agencies allow clerks and licensees to avoid forfeitures by successfully completing training sessions on alcohol sales and service.

Wisconsin's required *Responsible Beverage Server* (RBS) training is minimal, additional training and internal enforcement policies are the responsibility of the license holder. Municipalities may not *require* additional training. New employees often have very little alcohol sales training. In addition not every person selling or serving alcohol needs to hold a bartenders (called operators) permit to sell or serve alcohol. Just one licensed operator needs to be on the premises in a supervisory role whenever the establishment is open.

Clerks may receive only training provided by the retailer. Increasingly, local law enforcement offers retailer training to encourage compliance and reduce alcohol related problems in the community. Both the Madison Police Department and the La Crosse Police Department offer training to alcohol sellers, servers and licensees. In some situations, additional training is an appropriate substitute for other sanctions after a violation.

Individuals or establishments that consistently fail compliance checks may need additional incentive to become compliant. Law enforcement agencies can document repeated alcohol sales to underage decoys, raising the issue during the license renewal period. The effectiveness of alcohol age compliance check depends on both the ongoing operation of the program and a credible belief that serious sanctions will be imposed on repeat offenders.

Operational Guides

There are several well documented protocols available that outline every aspect of alcohol age compliance checks. In Wisconsin, a frequently used protocol is the Minnesota Alcohol Epidemiology Program Alcohol Age Compliance Checks <http://www.epi.umn.edu/alcohol/manual/manual.pdf>

Some aspects of the Minnesota manual conflict with Wisconsin law, involvement of local law enforcement will help identify those conflicts. Appendix A of the

Minnesota protocol is a *Decision Checklist* that includes many of the decisions outlined in this summary.

Community alcohol and drug coalitions may benefit from the planning and organizational materials found in: [Using Getting To Outcomes™ with the SAMHSA Strategic Prevention Framework to Achieve Results](http://www.rand.org/content/dam/rand/pubs/technical_reports/2007/RAND_TR403.pdf) (beginning on page 139) available online at: http://www.rand.org/content/dam/rand/pubs/technical_reports/2007/RAND_TR403.pdf

Well run operations require well trained officers. Appendix 2 of this summary provides information on several training opportunities available to Wisconsin law enforcement agencies.

After the Operation

After the completion of each series of compliance checks, the establishments checked will fall into one of two categories:

- 1) Locations unwilling to sell alcohol to underage decoys
- 2) Locations willing to sell alcohol to decoys.

Aggregate results from each round of alcohol age compliance checks should be released widely to the media. Frequently, the first round of compliance checks reveals a shocking lack of compliance with 50% or even 75% of merchants selling to youth decoys. Results often improve dramatically in subsequent rounds of compliance checks *if retailers are sanctioned*, a good reason to keep going after a disappointing result.

The National Academies of Science suggested a national goal of 80% compliance in 2004.¹⁰ The Wisconsin State Council on Alcohol and Other Drug Abuse (SCAODA) endorsed the national standard for Wisconsin as part of the 2010 report, *Alcohol, Culture and Environment Workgroup Recommendations: Changing Wisconsin's Alcohol Culture to Promote Safe and Healthy Lives*. It is an achievable goal your community can track over a period of years.

The names of establishments willing to sell alcohol to youth should be released to the media after the conclusion of the checks. A brief straightforward release listing the noncomplying establishments encourages retailers to train and monitor identification checking procedures. Repeated failures should be noted in the licensee's record and discussed several months prior to license renewal based on the guidance provided by the municipal attorney. Coalition or community group members may wish to add letters to the licensee file for review before license renewal.

Licenseses that refused to sell to decoys should receive letters praising their successful training and screening procedures. The names of these good citizen businesses should be released to the media separately from the names of ticketed establishments to avoid any confusion. In some jurisdictions, community alcohol and drug prevention agencies organize media events to recognize licenseses that pass alcohol age compliance checks in addition to volunteer assistance with the operation. When recognition comes from a community group, refusing to sell alcohol to youth becomes a matter of civic responsibility.

If the compliance rate fails to improve significantly during the second series of checks, it is time to reconsiders both the protocol and the consequences for retailers of failing a compliance checks. Compliance rates commonly improve steadily in subsequent checks, eventually reaching an acceptably high rate. If that is not happening, coalition leaders, working closely with law enforcement, should consider the barriers blocking progress and consider ways to overcome them

Alcohol age compliance checks are just one part comprehensive efforts to prevent and reduce underage drinking. No single agency, individual or group can change the community alcohol environment.

Alcohol age compliance checks support a broader community consensus and an improved community alcohol environment. By utilizing the resources available through local community coalitions, the Underage Drinking Enforcement Training Center and the Wisconsin law enforcement agencies currently conducting effective alcohol age compliance checks, each municipality has the ability to reduce and prevent underage drinking by implementing alcohol age compliance checks.

Appendix 1: Coalition Tasks in Support of Alcohol Age Compliance Checks

For many years, community coalitions, Police Explorer Scouts and other groups have been volunteering time to support local alcohol age compliance checks. Adult volunteers allow police officers to focus their time on the tasks only they can perform. When federal funding for the Enforcing Underage Drinking Laws program was terminated, many communities quickly discovered that sustaining existing compliance operations or initiating new ones required community support and finding dedicated partners.

Local logistical support varies widely from community to community. Drug Free Community grants can be used to support alcohol age compliance checks. Often financial support mirrors significant logistical support. In general, the tasks fall into three general categories outlined below, each community must find the combination of law enforcement and coalition support that supports the scope and goals of the operation.

1. Provide logistical and administrative support

Coalitions can provide behind the scenes support such as obtaining the buy-money for each operation and photocopying the cash (to create a record of serial numbers), assembling the paper work and subsequent record keeping for the operation.

Coalitions can obtain a list of all current licensees and mail a pre-notification letter written or approved by the law enforcement agency. Although not required, pre-notification letters are recommended. Compliance with the law is the goal these are not “sting” operations.

A coalition could also assume responsibility for compiling the test results and data into a spreadsheet that tracks each compliance check. The specific role varies with one group collecting only aggregate data and another creating a record for police department purposes. Each law enforcement agency must determine the appropriate data to be collected, its use, and ownership. Tracking citations is a municipal responsibility.

Law enforcement may release the aggregate results at the conclusion of the test period, with the coalition acting in a support role. Some coalitions organize recognition for retailers who have repeatedly demonstrated compliance with the law. A few communities rely on coalitions to tabulate the aggregate results and release them to the media calling attention to both those in compliance and those failing to comply.

2. Recruit and schedule youth decoys for the program.

Youth can purchase tobacco legally beginning at age 18. Youth aging out of tobacco age compliance work, criminal justice students at local colleges and police Explorer Scouts are all good sources of youth decoys. Law enforcement

agencies will conduct full background checks on all potential decoys and may have personal appearance requirements

Multiple youth decoys will be needed; in small communities and rural areas youth should not act as decoys in the home community where they are likely to be recognized. A pool of at least 6 or 7 youth of both genders is suggested.

In some communities youth are paid a stipend after the round of compliance checks is conducted. In Racine youth receive \$10.00 per hour and are scheduled for four hour blocks of time per day.

Some coalitions take responsibility for scheduling youth for the compliance check operations and providing transportation to and from the police station.

At the request and with the guidance of primary law enforcement agency, local coalitions can schedule, organize and, in some cases, provide training to youth decoys at requested intervals. At a minimum, youth decoys need an orientation before the first operation outlining the steps to a sale, what to expect and common scenarios.

Before beginning each shift, youth should be photographed creating a record of how they were dressed and groomed during the operation. Digital photos can be pasted right into the file of any later citations.

Some coalitions provide an adult volunteer to ride along with the officer and decoy as a witness to the operation.

3. Vocally and publicly support alcohol age compliance checks and other actions that enforce Minimum Legal Drinking Age Laws.

Every coalition should organize vocal citizen support for the law enforcement agency conducting alcohol age compliance checks, including letters to the editor of local media outlets and calls of support to local elected officials such as Aldermen or the Police Commission.

The police need community support to take actions designed to prevent or reduce underage drinking and alcohol misuse, including age compliance checks. Law enforcement agencies can experience substantial push-back from trade and industry groups; unless the community coalition articulates community support elected officials may conclude the community does not support compliance check operation.

Appendix 2: Law Enforcement Training Opportunities on Alcohol Age Compliance Checks

There is an ongoing need for training on alcohol age compliance check procedures. Fortunately, free online distance learning opportunities are available through the Underage Drinking Enforcement Training Center (UDETC) <http://www.udetc.org/distancelearning.htm>.

The online class takes about 90 minutes and may be taken individually or in a group. The procedure in the class is very similar to the procedure used in the operational guides listed earlier. In addition, the class materials include many of the forms and documents needed in an easily amendable Word format.

Each law enforcement agency must make its own determination whether the on-line training should be supplemented by field training with a UDETC trainer or a UDETC certified trainer. For a list of the UDETC certified alcohol age compliance check trainers in Wisconsin please contact the Wisconsin Alcohol Policy Project at <http://law.wisc.edu/rcid/> or call 608-262-0370.

The Underage Drinking Enforcement Training Center website has information about the additional training opportunities available through the Center.

Visit <http://www.udetc.org/index.asp> for more information.

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¹ National Research Council an Institute of Medicine (2004) Reducing Underage Drinking: A Collective Responsibility. Committee on Developing a Strategy to Reduce and Prevent Underage Drinking, Richard J. Bonnie and Mary Ellen O'Connell, Editors, Board on Children, Youth and Families, Division of Behavioral and Social Sciences and Education. Washington, D.C. The National Academies Press.

² Wagenaar AC, Toomey TL, Erickson DJ. Preventing youth access to alcohol: Outcomes from a multi-community time-series trial. *Addiction*, 100(3):335-45, 2005.

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⁴ Pacific Institute for Research and Evaluation, Conducting Compliance Check Operations: Enforcing Underage Drinking Laws (online course)www.thecjportal.org/dl/PIRE/CC Underage Buyer/Volunteer Letter

⁵ Alcohol Epidemiology Program. *Alcohol compliance checks: A procedures Manual for enforcing alcohol age-of-sale laws*. Minneapolis: University of Minnesota, 2000.

⁶ Alcohol Epidemiology Program. *Alcohol compliance checks: A procedures Manual for enforcing alcohol age-of-sale laws*. Minneapolis: University of Minnesota, 2000. New Hampshire Liquor Commission, Division of Enforcement & Licensing, Compliance Checks Policy, <http://www.nh.gov/liquor/enforcement/about-us/documents/compliance-checks.pdf>. Selective Alcohol and Tobacco Initiative. accessed online 1/18/13

⁷ Alcohol Epidemiology Program. *Alcohol compliance checks: A procedures Manual for enforcing alcohol age-of-sale laws. Prior Notice*. Minneapolis: University of Minnesota, 2000.

⁸ Toomey & Wagenaar, Policy Options for Prevention (1999)

⁹ Conversation with Francie Peardon, Eau Claire Public Health Department, December 2012.

¹⁰ National Research Council and Institute of Medicine (2004), Reducing Underage Drinking: A Collective Responsibility. Committee on Developing a Strategy to Reduce and Prevent Underage Drinking, Richard J. Bonnie and Mary Ellen O'Connell, Editors. Board on Children, Youth and Families, Division of Behavioral and Social Sciences and Education. Washington D.C. The National Academies Press.