



Agricultural Marketing Service

U.S. DEPARTMENT OF AGRICULTURE



AMS

Module 5

Follow-Up Reviews and Recordkeeping



Lesson Objectives

- 2022 Follow Up Review Procedures.
- Noncompliance (NC) Codes 10-16.
- Understanding COOL recordkeeping requirements in [7 CFR 60.400](#) and [7 CFR 65.500](#).
- Record Selection Process.
- Recordkeeping and the BE-COOL CRM.
- Photographic evidence guidelines.

Initial and Follow-Up Reviews

Both Initial and Follow-up Reviews include:

- Opening Meeting,
- Reviewing commodities for labeling compliance,
- Citing noncompliant items with full details,
- Closing Meeting, and,
- Informing the Representative that USDA will provide the final results of the review.



Initial vs. Follow-Up Review

Initial Review

- Only NC codes 1-9 apply.
- Ask 5 Questions.

Follow-Up Review

- NC codes 1-16 apply.
- Must obtain pictures of noncompliant items and the store front.
- Collect record information for the commodity groups.



2022 Follow Up Procedures Update

- Take picture of the retail store front.
- Review last year's results – pay close attention to last year's noncompliant items.
- Capture email address from store representative – official results of the review will be provided by USDA via email.

Follow Up Review Procedure Update – Record Request Form

New Records Request Form:

- Complete the form, including the item info.
- The reviewer will sign the records request form.
- The store representative will sign the records request form.
- You will take a picture of the completed records request form and upload the picture to the BE-COOL CRM system.
- The store representative keeps the signed form.

Follow Up Review Update - Photographs

- Take multiple pictures of all noncompliant items. Get a picture of the sign, the noncompliant item and all parts of the package that have writing on them. Pictures should include:
 1. The noncompliant label (or missing information),
 2. An image of the product in total including any signage, and,
 3. Pictures of the front and back of the package where there is information.
- Take a picture of the covered commodity selected for records review. (The item can be compliant or noncompliant).
- Take a picture of the records themselves or obtain a copy of the records. Records will be uploaded to the BE-COOL CRM.



Noncompliance Codes 10-16

Noncompliance codes 10-16 are used for Follow-up Reviews

Code	Non-Compliance Findings for Follow-up Retail Reviews
10	Records were not provided within 5 business days.
11	Records do not provide the <u>country of origin</u> information.
12	Records do not provide the method of production information.
13	Records do not provide the Supplier information. (Supplier records are required for all Traceback Items)
14	Records information for country of origin as provided by supplier is not accurately conveyed to point of sale label.
15	Records information for method of production as provided by supplier is not accurately conveyed to point of sale label.
16	Records that identify the chain of custody for the pre-labeled item were not provided within 5 business days.

NC Code 10 – No Records Provided Within 5 Business Days

NC code 10 applies when the retailer does not provide records within 5 business days from the request.

7 CFR 60.400 (a) and 7 CFR 65.500 (a)(2)

<u>Code</u>	<u>Non-Compliance Findings</u>
10	Records were not provided within 5 business days.

NC Code 11 – No Country of Origin on Records

NC code 11 applies when records do not provide the country of origin information for the covered commodity. The country of origin may be abbreviated on the record provided that the retailer can accurately decipher the country information.

7 CFR [60.400 \(c\)\(3\)](#) and 7 CFR [65.500 \(c\)\(2\)](#) and 7 CFR [65.500 \(c\)\(4\)](#)

<u>Code</u>	<u>Non-Compliance Findings</u>
11	Records do not provide the <u>country of origin</u> information.

NC Code 12 – No Method of Production (MOP) on Records

NC code 12 applies when records do not provide the method of production information. The method of production may be abbreviated on the record provided that the retailer can accurately decipher the country information.

7 CFR 60.400 (c)(2) and 7 CFR 60.400 (a)(2)

<u>Code</u>	<u>Non-Compliance Findings</u>
12	Records do not provide the method of production information.

NC Code 13 – No Supplier Information on Records

NC code 13 applies when records do not provide the supplier information. The required supplier information includes the supplier name and address (city and state at a minimum).

7 CFR 60.400 (c)(3) and 7 CFR 65.500 (c)(4)

<u>Code</u>	<u>Non-Compliance Findings</u>
13	Records do not provide the Supplier information. (Supplier records are required for all <u>Traceback Items</u>)

NC Code 14 – Conflicting Records Country of Origin

NC code 14 applies when the country of origin on the record from the supplier is not accurately conveyed to the consumer.

7 CFR [60.400 \(c\)\(1\)](#) and 7 CFR [65.500 \(c\)\(1\)](#)

<u>Code</u>	<u>Non-Compliance Findings</u>
14	Records information for country of origin as provided by supplier is not accurately conveyed to point of sale label.

NC Code 15 – Inaccurate Method of Production

NC code 15 applies when the method of production provided by the supplier's record is not accurately conveyed to the consumer.

7 CFR 60.400 (c)(1)

<u>Code</u>	<u>Non-Compliance Findings</u>
15	Records information for method of production as provided by supplier is not accurately conveyed to point of sale label.

NC Code 16 – Records for a Pre-labeled Item Not Received in 5 Business Days

NC code 16 applies when records identifying the immediate previous supplier for a pre-labeled item were not provided within 5 business days.

[7 CFR 60.400 \(c\)\(3\)](#) and [7 CFR 65.500 \(a\)\(2\)](#) and [7 CFR 65.500 \(c\)\(4\)](#)

<u>Code</u>	<u>Non-Compliance Findings</u>
16	Records that identify the chain of custody for the pre-labeled item were not provided within 5 business days.

Refresher on pre-labeled items

Pre-labeled: An item that lists on the package the Country of Origin and Method of Production (if applicable) along with the packer or distributor's name, city and state. [7 CFR 60.118](#) and [7 CFR 65.218](#)

When a pre-labeled item is selected in a Follow-up review, a second record is required. The pre-labeled item is considered the first record and the second record needs to show the immediate previous supplier.

Difference between NC 10 and NC 16

If the retailer did not provide records from their immediate previous supplier within 5 business days, cite the appropriate NC code:

- NC 10 applies for items that are not pre-labeled.
- NC 16 applies for items that are pre-labeled.



Recordkeeping and Record Collection for Follow-up Reviews



Recordkeeping Requirements

- Records must be legible and may be maintained in either electronic or hard copy formats. 7 CFR 60.400(a)(1) and 7 CFR 65.500(a)(1)
- Upon request by USDA representatives, retailers must provide records maintained in the normal course of business within 5 business days. Records may be maintained in any location. 7 CFR 60.400(a)(2) and 7 CFR 65.500(a)(2)

Recordkeeping Requirements

Records that identify the item, the retail supplier, and for products that are not pre-labeled, the country of origin information and the method of production (wild and/or farm-raised) must be maintained for a period of 1 year from the date the declaration is made at retail. 7 CFR 60.400(c)(3) and 7 CFR 65.500(c)(3)

Recordkeeping Requirements: Pre-labeled items


For pre-labeled items, the label itself, as illustrated in the example (Snowcrest Foods, Ltd., Abbotsford, British Columbia), as it has the country of origin, packer or distributor's name, city and state is sufficient for the retailer to rely on to establish the product's origin and is a record. 7 CFR 60.400(c)(2) and 7 CFR 65.500(c)(2)



Examples of Records

Common examples of records used during the normal course of business include:

- Invoice
- Bills of Lading (BOL)
- Shipping Manifest
- Receipt
- Master Container
- Pre-Labeled Container

		1234 Columbus Ave. P.O. Box 10000 Somewhere, IN 00000 PHONE (000) 000-0000 FAX (000) 000-0000		INVOICE 6789045		CUST. NO. 008067 SALES NO. 01284329		DATE 08/17/20 PAGE 1			
P.O. PO-567892 TERMS 7 DAYS		SOLD TO Fresh Harvest Foods 806 Food Street Anytown, VA 00000		SHIP TO Fresh Harvest Foods 806 Food Street Anytown, VA 00000							
ITEM	PLU	ORDER	SHIPPED	SHIP/SIZE	DESCRIPTION	COO	G.M. %	S.R.P.	WEIGHT	UNIT	AMOUNT
04392		1.00	1.00	12/5 OZ	VN RAW PIS TACHIO KERNAL		39.797	7.89	8.00	57.000	57.00
09007		1.00	1.00	6/5 OZ	OG GIRL BB SPIN/ARUGULA		-.143	2.33	4.00	14.000	14.00
09008		1.00	1.00	6/4.2 OZ	OG GIRL PROTEIN GREENS		-.143	2.33	4.00	14.000	14.00
00340		1.00	1.00	5#	CARROTS MATCH STICKS		49.857	3.49	6.00	8.750	8.75
03596	04550	1.00	1.00	5#	BRUSSELS SPROUTS BAG	MEX	49.871	3.89	7.00	9.750	9.75
05644	04583	1.00	1.00	24 CT SLVD	SLVD CELERY	USA	50.514	1.19	50.00	26.500	26.50
01411	04061	2.00	2.00	24 CT	LETTUCE ICEBERG WRAPPED	USA	50.186	1.79	74.00	26.750	53.50
01399		1.00	1.00	18/12 OZ	GARDEN 12 OZ		37.733	1.49	16.00	16.700	16.70
00427		2.00	2.00	6/8 OZ	SHREDDED LETTUCE		42.922	2.19	10.00	7.500	15.00
00438		1.00	1.00	6/5 OZ	BABY 50/50 SPIN/SPRING		37.943	3.29	6.00	12.250	12.25
00398		1.00	1.00	6/5 OZ	BABY SPINACH SALAD		41.500	3.49	4.00	12.250	12.25
03106		1.00	1.00	6/10.2 OZ	CAESAR BACON		38.043	4.99	6.00	18.550	18.55
03329		1.00	1.00	6/7.75 OZ	BB CHEF SALAD		37.358	4.39	6.00	16.500	16.50
03328		1.00	1.00	6/6.25 OZ	BB CHICKEN CAESAR SALAD		37.358	4.39	6.00	16.500	16.50
03331		1.00	1.00	6/7.25 OZ	BB COBB SALAD		37.358	4.39	6.00	16.500	16.50
05962		1.00	1.00	4/36 OZ	TF VEG TRAY PEAS & PEPPERS		100.000	.00	11.00	26.250	26.25
04588	04889	2.00	2.00	6 EA BAG	CILANTRO BAG	USA	46.483	1.09	12.00	3.500	7.00
01338	4627	1.00	1.00	3 EA BAG	KALE	MEX	44.072	1.49	3.50	2.500	2.50
00692	4085	1.00	1.00	5#	MUSHROOMS JUMBO	CAN	39.866	4.49	6.00	13.500	13.50
05556		2.00	2.00	6/8 OZ	MUSHROOMS SLICED GRILLERS	CAN	45.081	3.49	12.00	11.500	23.00
00510	4068	2.00	2.00	12 CT BAG	GREEN ONIONS	MEX	49.895	.79	7.50	4.750	9.50
01187	4080	1.00	1.00	3 EA BAG	RADISHES RED	USA	50.600	1.60	1.75	2.500	2.50
01068	4065	1.00	1.00	50/55 CT	PEPPER GRN BELL XL	USA	43.347	.69	27.00	21.500	21.50
01072	4693	2.00	2.00	2# BAG	PEPPER JALAPENO	USA	45.141	3.19	4.00	3.500	7.00
REPACKS WEIGHT CONT		FULL CASE CASE ROUTE 140		The Perishable Agricultural Commodities listed on this invoice are sold subject to the statutory trust authorized by Section 5(c) of the Perishable Agricultural Commodities Act, 1930 (7 U.S.C. 499c(c)). The seller of these commodities retains a trust claim over these commodities, all inventories of food or other products derived from these commodities, and any receivables or proceeds from the sale of these commodities until full payment is received.				CONT (CONT%) TOTAL PROFIT DOLLARS		PAY THIS AMOUNT CONT	

Requesting Records: Selecting Items

Follow-Up reviews must request records during the review. Records are requested for six items, one item from each of the six covered commodity groups:

- Fresh and Frozen Fruits
- Fresh and Frozen Vegetables
- Fresh and Frozen Fish and Shellfish
- Nuts (Macadamia, Peanuts, and Pecan) and Ginseng
- Chicken (ground and muscle cuts)
- Goat and Lamb (ground and muscle cuts)



Requesting Records: Selecting Specific Items

- Category: Fresh and Frozen Fruit. Please select records for one of these fresh items:
 1. Cantaloupe
 2. Tangerine
 3. Orange
- *If none of the items listed above are sold at the store, select any item within the same fresh fruit commodity group.

Requesting Records: Selecting Specific Items, page 2

- Category: Fresh and Frozen Vegetables. Please select records for one of these fresh items:

1. Eggplant
2. Collard greens
3. Green beans
4. Summer Squash

*If none of the items listed above are sold at the store, select any item within the same fresh vegetable commodity group.

Requesting Records: Selecting Specific Items, page 3

Category: Fresh and Frozen Fish and Shellfish.

Order of preference for selection (any variety):

1. Fresh wild caught fish or shellfish item;
2. Frozen wild caught fish or shellfish item;
3. Fresh or frozen farm raised fish or shellfish item.

Requesting Records: Selecting Specific Items, page 4

Category: Nuts (Macadamia, Peanuts, and Pecan) and Ginseng.

Order of Preference for selection:

1. Ginseng
2. Macadamia Nuts
3. Peanuts
4. Pecans



Requesting Records: Selecting Items

- Category: Chicken/Lamb/Goat
Any covered commodity.



Requesting Records: Not Sold in Store?

- If the store does not sell any items in an entire commodity group, check “not sold in store”.
- For example, if a store doesn’t sell any ground or muscle cuts of goat and lamb, check “not sold in store”.
- The review would then only have 5 records requested.

Records Verification

- Records provided by the store need to match the item observed during the review such as size, brand, item name, date.
- The date must be reasonable. If the record for fresh raspberries show the shipment was received 3 months earlier, that record doesn't pertain to the item observed during the review.
- If the records are submitted after the review for a shipment that the store received after the review occurred, the record doesn't pertain to the item observed during the review.
- The reviewer must verify that the retailer has provided the correct record.



Requesting Records

- Most stores will provide records during the review.
- If the store does not provide records during the review, they may send them to the reviewer within 5 business days.
- The Records Request Form provides the store with the necessary info to locate and submit records, such as the due date and how the store can send you the records, such as your email address or fax number.

Country of Origin Labeling (COOL) Retailer Records Request Form

Providing records for Country of Origin Labeling (COOL) is easy, just follow these 3 steps.

Step 1: Locate record(s) for each of the items listed below. Examples of records include invoice, bill of lading (BOL), shipping manifest, receipt, master shipping container, etc.

- For each pre-labeled item, records must identify the covered commodity (the item listed below) and your immediate previous supplier's name and address (minimum of city and state).
- For each item that is not pre-labeled, records must identify the covered commodity (the item listed below), country of origin, method of production (for fish and shellfish items only), and your immediate previous supplier's name and address (minimum of city and state).

Item	Item Name	Is the item Pre-labeled?	Item Name & Description (Example: Green Beans, Home Brand, Frozen, 16 oz., Dist. by ABC Company, City/State, Lot code 123456, UPC 1234567890, Best By DATE)
1		Yes / No	
2		Yes / No	
3		Yes / No	
4		Yes / No	
5		Yes / No	
6		Yes / No	

Step 2: Find the item on your record and circle the item, so it's easy for others to locate.

Step 3: Submit records via email or fax. Include the Review Number. **Records must be submitted within 5 business days of the request.**

Reviewer's Name: _____ Reviewer Email: _____ Reviewer Fax: _____ Reviewer Signature: _____	Date of Review: _____ Review Number: _____ Date Records Due: _____ Store Representative Name: _____ Store Representative Signature: _____
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By signing, I acknowledge providing this form.

By signing, I acknowledge receipt of this form.

Questions? Contact the Food Disclosure and Labeling Division at 202-720-4486 or coolmail@usda.gov

Requesting Records (cont.)

- New Record Request Form.
- Reviewer will fill out the form including name, date, review number, contact information, and signature.
- The Reviewer and the store representative need to sign the records request form.
- Take a picture of the form and upload to the BE-COOL CRM system.



Country of Origin Labeling (COOL) Retailer Records Request Form

Providing records for Country of Origin Labeling (COOL) is easy, just follow these 3 steps.

Step 1: Locate record(s) for each of the items listed below. Examples of records include invoice, bill of lading (BOL), shipping manifest, receipt, master shipping container, etc.

- For each pre-labeled item, records must identify the covered commodity (the item listed below) and your immediate previous supplier's name and address (minimum of city and state).
- For each item that is not pre-labeled, records must identify the covered commodity (the item listed below), country of origin, method of production (for fish and shellfish items only), and your immediate previous supplier's name and address (minimum of city and state).

Item	Item Name	Is the item Pre-labeled?	Item Name & Description (Example: Green Beans, Home Brand, Frozen, 16 oz., Dist. by ABC Company; City/State, Lot code 123456, UPC 1234567890, Best By DATE)
1		Yes / No	
2		Yes / No	
3		Yes / No	
4		Yes / No	
5		Yes / No	
6		Yes / No	

Step 2: Find the item on your record and circle the item, so it's easy for others to locate.

Step 3: Submit records via email or fax. Include the Review Number. Records must be submitted within 5 business days of the request.

Reviewer's Name: _____	Date of Review: _____
Reviewer Email: _____	Review Number: _____
Reviewer Fax: _____	Date Records Due: _____
Reviewer Signature: _____	Store Representative Name: _____
	Store Representative Signature: _____

By signing, I acknowledge providing this form.

By signing, I acknowledge receipt of this form.



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Recordkeeping and the BE-COOL CRM System

Documenting Recordkeeping Information in CRM

In addition to what is entered for Initial reviews, Follow-Up reviews include a recordkeeping section.

The screenshot displays the 'Review Workbook Progress' interface. On the left, a sidebar shows the progress of three sections: '1. Store Details' (Complete), '2. Fruits' (Not Started, highlighted with a red box), and '3. Nuts & Oils' (Not Started). The main content area is titled 'Section 2: Fruits' and includes buttons for 'NC Code Information', 'Review Guidelines', and 'Not Started'. Below these, there are two tabs: 'Review' and 'Recordkeeping', with a green arrow pointing to the 'Recordkeeping' tab. The 'Recordkeeping' section contains a 'Not Sold in Store?' checkbox, a 'Mark As Complete?' checkbox, and a 'Number of Items Reviewed:' field with the value '0'. At the bottom, there is a table with columns for 'Non-Complying Items', 'NC Codes', and 'Notes'.

Documenting Recordkeeping Information in CRM, page 2

- Click on the “Recordkeeping” tab for each commodity group.
- Select what was the item category observed (ie fresh fruit).

Review **Recordkeeping**

Store Label Description

Actual Group Reviewed

A-Fresh Fruits ▼

Item Description (Label)	Country of Origin (Label)	Item Description (Record)	Country of Origin (Record)
Nectarine PLU 4377	USA	Bulk Nectarines 30#	USA

Documenting Recordkeeping Information in CRM, page 3

Supplier Information: This captures the supplier who provided the retailer with the item, also known as the immediate previous supplier. Please provide as much detail as possible.

Supplier Information (Pre-labeled Package):

Retailer's Immediate Previous Supplier Information (Store Record):

Previous Supplier Name	Previous Supplier Email Address	Previous Supplier Phone
<input type="text"/>	<input type="text"/>	<input type="text"/>
Previous Supplier Street Address		
<input type="text"/>		
Previous Supplier City	Previous Supplier State	Previous Supplier Zipcode
<input type="text"/>	Select <input type="text"/>	<input type="text"/>

Documenting Recordkeeping Information in CRM, page 4

Records Reviewed section: Select from the drop-down menu the type of record(s) reviewed (bill of lading, invoice, shipping manifest, master container label, package label, etc.). Provide the complete details and information from the record.

Records Reviewed	
Record Reviewed	Record Transaction ID / Record Details

Documenting Recordkeeping Information in CRM, page 5

- “Recommended for STA?” – Leave blank.
- “Were Records Provided?” and “Were Records Validated?”
- For both, select yes if records were provided during the review or within 5 business days of your request. Select no if records were not provided.

Recommended for STA?

Select an Option ▼

Were Records Provided?

Select Yes Or No ▼

Were Records Validated?

Select Yes Or No ▼

Recordkeeping Noncompliances

If there is a recordkeeping noncompliance, add the appropriate NC code and description under the review section for records. NC codes 10 – 16 apply.

Review Workbook: Progress

Total Retail Items Reviewed: 0
Total NC Items Cited: 0
Total NC Codes Cited: 0

1. Store Details Complete

2. Fruits Not Started

3. Nuts & Ginseng Not Started

4. Vegetables Not Started

5. Fish & Shellfish Not Started

6. Chicken Not Started

7. Lamb & Goat Not Started

8. Overall Comments Not Started

Section 2: Fruits NC Code Information Review Guidelines Not Started

Review Recordkeeping

Not sold in store? Mark As Complete? Number of Items Reviewed: 0

Non-Complying Items	NC Codes	Notes
+ Add Item		

Save Current Section Save and Continue To Next Section



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Capturing Photographic Evidence

Photographs

- Take a picture of the store front for all follow-up reviews.
 - A picture of the store front is required even if the retailer has no findings.
- Take pictures of every noncompliant item including the display.
- Take pictures of every item selected for recordkeeping.
- Take pictures of all records provided by the retailer for the record review items.



Photograph Tips

- Take a picture of the item along with the specific NC issue, this should also include a picture of the item's display. You likely will need multiple pictures.
- If the Country of Origin is not accurate (NC 3), be sure to capture the conflicting labels and/or signs showing the different country of origins.
- If the issue is no country of origin (NC1), capture the item's display demonstrating there's no COOL on a store sign, label, PLU, etc.
- If the NC is a records issue, such as inaccurate COOL, pictures are needed of the item with the COOL shown on the label or sign to the consumer as well as the records showing a different country of origin.

Photograph Tips for Evidence

- Take a picture of the records request form after it has been signed by the store personnel.
 - Upload a picture of the records request form to CRM.
- Utilize date and time stamp settings on camera. If possible, also include the name of who the photographer is on the photo. If not possible, include in comments section the photographer's name.
- Each noncompliant item should be photographed in its entirety.
 - This includes the display and any store signage, the individual item itself. If the item has multiple sides to the package, then take pictures of all sides of the package. Why is this important? We want to remove any doubt that the COOL or MOP could have been elsewhere on the package or store sign.

Noncompliant Item Photograph Example

The item listed (Pepper Variety Frying) lacks the country of origin. NC 1 is cited, pictures are required.

- Picture 1: the overall display
- Picture 2: the item itself
- Picture 3: the sign and item



Photos of Pre-labeled Packages

- Capture as much of the item/label as possible.
- For pre-labeled peas, take pictures of the front and back of the item.
 - It's necessary to know the brand, size, lot number, best by date, production codes, etc.



Photos of Documents as Records

Documents such as invoices, bills of lading, shipping manifests, etc. have many pages. When the item selected for review is not on the first page, capture the first page of the record (usually has the supplier's info, number, date, etc.) and the specific page where the item is listed.

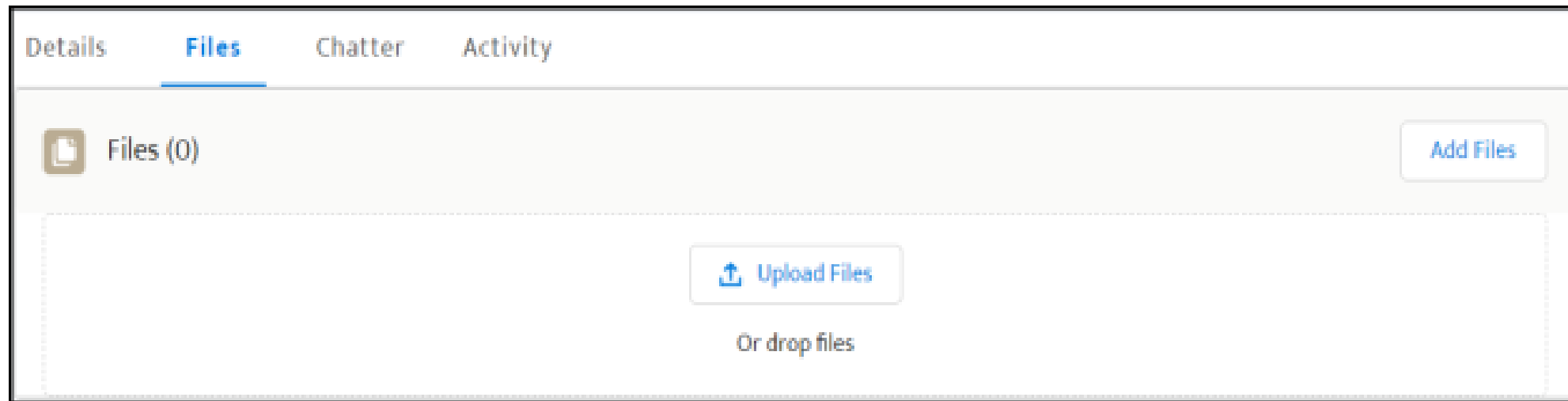
STORE 123 Anytown USA		ABC Supplier		123 Main Street, City, State, ZIP		DEPT 50: PRODUCE		WHSE DEA NBR:		XDOCK DEA NBR:		
QTY	QTY	ITEM #	DESCRIPTION	SIZE	PRODUCT UPC	FREIGHT	TOTAL	DELV DT: 10/31/2019	INVOICE#	123456	EXT NT COST	
ORD	SHIP	SLOT #					ALLOW	NET COST	GROSS %	RTL UT	UNT RTL	EXT NT
1	1	2-301604	MARZ DILL VEG DIP	14 OZ	000007020052202						0	
		P12252									1	
		DAMAGE ALLOW = -0.22										
1	1	2-301613	MARZ LT DILL DIP	14 OZ	000007020052206						6	
		P12173									1	
1	1	2-573436	MSHRM SLICED 8Z	8 OZ	000000580617511						4	
		P12289									1	
1	1	2-571224	MUSHR WHITE 8 OZ PKG	8 OZ	000060580617500						12	
		P12341									1	
1	1	2-301401	NS CHERUBS 10 OZ	10 OZ	000075166677155						15	
		P13341									1	
1	1	2-570390	ONION GRN 5.5OZ BAG	5.5OZ	000003338360503						24	
		P10591									1	

Photos of Master Containers as Records

Take pictures of all sides that have identifying info. This includes the supplier's info, item size, box weight, production date, lot numbers, Best By dates, Establishment number, etc.

Non-Compliant Items

- Upload pictures of items into the CRM for the associated review. Include any store signage in the picture.





Before Submitting to USDA

Manager Review includes checking that:

- All NC items have corresponding pictures,
- All NCs cited are correct,
- All information such as the retailer's email was obtained,
- Records were collected for the correct item based on USDA instructions, and,
- All records match the item observed.
- If necessary, the Manager should return the file to the reviewer for corrections before submitting the review to USDA.

Reminders

- Each Reviewer and Manager must be “COOL-certified” and pass the COOL Exam with a score of 85% or higher. Conducting follow-up reviews? Will also need to pass the follow-up exam. Sent via ProProfs.
- User information including eAuth must be provided to FDL D to use the BE-COOL CRM portal.
- Call retailers to ensure they’re open. NEW in 2022: FDL D will not reimburse for closed stores.
- Submit retail reviews through the BE-COOL CRM portal.
- Managers must review the retail review. USDA will return deficient reviews for correction.



Your collaboration is key for consumers ensuring they know the source of their food. Thank you!



Thank you for completing Module 5!