

ANNUAL SYNAR REPORT

42 U.S.C. 300x-26

OMB № 0930-0222

FFY 2020

State: Guam

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INTRODUCTION

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

How the Synar report helps the Center for Substance Abuse Prevention

In accordance with the tobacco regulations, states are required to provide detailed information on progress made in enforcing youth tobacco access laws (FFY 2019 Compliance Progress) and future plans to ensure compliance with the Synar requirements to reduce youth tobacco access rates (FFY 2020 Intended Use Plan). These data are required by 42 U.S.C. 300x-26 and will be used by the Secretary to evaluate state compliance with the statute. The information to be reported is public (45 CFR 96.130 (f)) and is not confidential. Part of the mission of the Center for Substance Abuse Prevention (CSAP) is to assist states¹ by supporting Synar activities and providing technical assistance helpful in determining the type of enforcement measures and control strategies that are most effective. This information is helpful to CSAP in improving technical assistance resources and expertise on enforcement efforts and tobacco control program support activities, including state Synar program support services, through an enhanced technical assistance program involving conferences and workshops, development of training materials and guidance documents, and onsite technical assistance consultation.

How the Synar report can help states

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

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

Getting assistance in completing the Synar report

If you have questions about programmatic issues, you may call CSAP's Division of State Programs at (240) 276-2550 and ask for your respective State Project Officer, or contact your State Project Officer directly by telephone or email. If you have questions about fiscal or grants management issues, you may call the Grants Management Officer, Office of Financial Resources, Division of Grants Management, at (240) 276-1422.

Where and when to submit the Synar report

The ASR must be received by SAMHSA no later than December 31, 2019 and must be submitted in the format specified by these instructions. Use of the approved format will avoid delays in the review and approval process. The chief executive officer (or an authorized designee) of the applicant organization must sign page one of the ASR certifying that the state has complied with all reporting requirements.


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

- FFY 2020 Synar Survey Results: States that use the Synar Survey Estimation System (SSES) must upload one copy of *SSES Tables 1–8* (in Excel) to WebBGAS. **Please note that, beginning with the FFY 2019 ASR, SSES will generate Tables 6, 7, and 8, which are based on the optional microdata on product type, retail outlet type, and whether identification was requested. If your state does not submit these optional data, Tables 6, 7, and 8 will be blank. Tables 6, 7, and 8 are generated for the convenience of the state, and states are not required to submit completed versions of Tables 6, 7, or 8.** States that do not use SSES must upload one copy of ASR Forms 1, 4, and 5, and Forms 2 and 3, if applicable, (in Excel), as well as a database with the raw inspection data to WebBGAS.
- Synar Inspection Form: States must upload one blank copy of the inspection form used to record the result of each Synar inspection.
- Synar Inspection Protocol: States must upload a copy of the protocol used to train inspection teams on conducting and reporting the results of the Synar inspections. This document should be different than the Appendix C attached to the Annual Synar Report.
- A scanned copy of the signed Funding Agreements/Certifications

Each state SSA Director has been emailed a login ID and password to log onto the Synar section of the WebBGAS site.

FFY 2020: FUNDING AGREEMENTS/CERTIFICATIONS

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

PUBLIC HEALTH SERVICES ACT AND SYNAR AMENDMENT	
42 U.S.C. 300x-26 requires each state to submit an annual report of its progress in meeting the requirements of the Synar Amendment and its implementing regulation (45 C.F.R. 96.130) to the Secretary of the Department of Health and Human Services. By signing below, the chief executive officer (or an authorized designee) of the applicant organization certifies that the state has complied with these reporting requirements and the certifications as set forth below.	
SYNAR SURVEY SAMPLING METHODOLOGY	
The state certifies that the Synar survey sampling methodology on file with the Center for Substance Abuse Prevention and submitted with the Annual Synar Report for FFY 2020 is up-to-date and approved by the Center for Substance Abuse Prevention.	
SYNAR SURVEY INSPECTION PROTOCOL	
The state certifies that the Synar Survey Inspection Protocol on file with the Center for Substance Abuse Prevention and submitted with the Annual Synar Report for FFY 2020 is up-to-date and approved by the Center for Substance Abuse Prevention.	
State: Guam	
Name of Chief Executive Officer or Designee: Theresa C. Arriola	
Signature of CEO or Designee: 	
Title: Director	Date Signed: 11/27/2019
If signed by a designee, a copy of the designation must be attached.	

SECTION I: FFY 2019 (Compliance Progress)

YOUTH ACCESS LAWS, ACTIVITIES, AND ENFORCEMENT

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

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

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

Yes No

If Yes, current minimum age: 19 20 21 Other (Please specify.)

b. Have there been any changes in state law that impact the state's protocol for conducting Synar inspections?

Yes No

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

Changed to require that law enforcement conduct inspections of tobacco outlets

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

Changed to require ID to purchase tobacco

Changed definition of tobacco products

Other change(s) (Please describe.) P.L. 35-47 AN ACT TO AMEND §90103 OF CHAPTER 90, TITLE 10, GUAM CODE ANNOTATED, RELATIVE TO EXPANDING THE NATASHA PROTECTION ACT OF 2005 TO DEFINE AND PROHIBIT THE USE OF ELECTRONIC SMOKING DEVICES WHEREVER OTHER TOBACCO PRODUCTS ARE ALREADY PROHIBITED.

c. Have there been any changes in state law that impact the following?

Licensing of tobacco vendors Yes No

Penalties for sales to minors Yes No

Vending machines Yes No

Added product

categories to youth access law Yes No

2. Describe how the Annual Synar Report (see 45 C.F.R. 96.130(e)) was made public within the state prior to submission of the ASR. (Check all that apply.)

Placed on file for public review

Posted on a state agency Web site (Please provide exact Web address and the date when the FFY 2020 ASR was posted to this Web address.)

Web address: www.gbhwg.guam.gov & www.peaceguam.org

Date published: 11/29/2019

- Notice published in a newspaper or newsletter
- Public hearing

- Announced in a news release, a press conference, or discussed in a media interview
- Distributed for review as part of the SABG application process
- Distributed through the public library system
- Published in an annual register
- Other *(Please describe.)* _____

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

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

Guam Behavioral Health and Wellness Center (GBHWC).

Has this changed since last year's Annual Synar Report?

- Yes No

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

Guam Behavioral Health and Wellness Center and the Guam Department of Revenue and Taxation (DRT).

Has this changed since last year's Annual Synar Report?

- Yes No

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

Guam Department of Revenue and Taxation.

Has this changed since last year's Annual Synar Report?

- Yes No

4. Identify the following agencies and describe their relationship with the agency responsible for the oversight of the Synar requirements.

- a. Identify the state agency responsible for tobacco prevention activities (the agency that receives the Centers for Disease Control and Prevention's National Tobacco Control Program funding).**

Guam Department of Public Health and Social Services (DPHSS) and Guam Behavioral Health and Wellness Center.

- b. Has the responsible agency changed since last year's Annual Synar Report?**

- Yes No

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

- Are the same

- Have a formal written memorandum of agreement
- Have an informal partnership
- Conduct joint planning activities
- Combine resources
- Have other collaborative arrangement(s) *(Please describe.)* GBHWC continues to work in collaboration with other partnering agencies in the Governor's PEACE Council, Department of Public Health and Social Services (DPHSS) is an active member of the PEACE Council and leads the Non-Communicable Disease Consortium (NCD). GBHWC participates in the NCD Consortium to strengthen Guam's comprehensive state plans for mental health promotion and the prevention of substance abuse, suicide and other deaths resulting from NCD's. In turn, one of DPHSS priorities include Tobacco Prevention and Control Program (TCAT) which leads the NCD tobacco action team.
- No relationship

d. Does a state agency contract with the Food and Drug Administration's Center for Tobacco Products (FDA/CTP) to enforce the youth access and advertising restrictions in the Family Smoking Prevention and Tobacco Control Act?
 Yes No (if no, go to Question 5)

e. If yes, identify the state agency responsible for enforcing the youth access and advertising restrictions in the Family Smoking Prevention and Tobacco Control Act (the agency that is under contract to the Food and Drug Administration's Center for Tobacco Products (FDA/CTP)).
GBHWC's Prevention and Training Branch

f. Has the responsible agency changed since last year's Annual Synar Report?
 Yes No

g. Describe the coordination and collaboration that occur between the agency contracted with the FDA to enforce federal youth tobacco access laws and the agency responsible for oversight of the Synar requirements. (Check all that apply.) The two agencies:

- Are the same
- Have a formal written memorandum of agreement
- Have an informal partnership
- Conduct joint planning activities
- Combine resources
- Have other collaborative arrangement(s) *(Please describe.)* GBHWC Prevention and Training Branch is responsible for oversight of the Synar requirements and also employs program coordinators for Guam's FDA contract. Under the Synar Program, FDA's program coordinators were recruited and paid to assist in the inspections as youth chaperones and conducted the training for the Synar program, to assist with the 2019 Random Unannounced Synar Compliance inspections.
- No relationship

h. Does the state use data from the FDA enforcement inspections for Synar survey reporting?

Yes No

5. Please answer the following questions regarding the state's activities to enforce the state's youth access to tobacco law(s) in FFY 2019 (see 42 U.S.C. 300x-26 and 45 C.F.R. 96.130(e)).

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

Enforcement is conducted exclusively by local law enforcement agencies.

Enforcement is conducted exclusively by state agency(ies).

Enforcement is conducted by both local *and* state agencies.

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

PENALTY	OWNERS	CLERKS	TOTAL
Number of citations issued	30		30
Number of fines assessed	30		30
Number of permits/licenses suspended	0		0
Number of permits/licenses revoked	0		0
Other (Please describe.)			

- c. Are citations or warnings issued to retailers or clerks who sell tobacco to minors for inspections that are part of the Synar survey?

Yes No

If "Yes" to 5c, please describe the state's procedure for minimizing risk of bias to the survey results from retailers alerting each other to the presence of the survey teams:

In order to minimize risk of bias from retailers alerting each other to the presence on survey teams, GBHWC utilizes multiple survey teams to conduct simultaneous inspections. In addition, not all stores are inspected on the same day. Stores to be inspected are divided up so that inspections occur on different days.

- d. Which one of the following best describes the level of enforcement of state youth access to tobacco laws carried out in your state? (Check one category only.)

- Enforcement is conducted only at those outlets randomly selected for the Synar survey.
- Enforcement is conducted only at a subset of outlets not randomly selected for the Synar survey.
- Enforcement is conducted at a combination of outlets randomly selected for the Synar survey and outlets not randomly selected for the Synar survey.

- e. Did every tobacco outlet in the state receive at least one compliance check that included enforcement of the state youth tobacco access law(s) in the last year?

Yes No

- f. What additional activities are conducted in your state to support enforcement and compliance with state youth tobacco access law(s)? (Check all that apply and briefly describe each activity in the text boxes below each activity.)

Merchant education and/or training

GBHWC's Prevention and Training Branch and the Department of Revenue and Taxation jointly coordinate and conduct merchant and community education. Both agencies are responsible for coordinating random, unannounced Synar inspections. During compliance inspections, retailers are provided with merchant education packets and other merchant materials such as door stickers and register sticker signs displaying "P.L. 34-01 No Sale Under 21" Annually GBHWC produces and distributes merchant educational and awareness materials in a packet to 350+ licensed tobacco vendors that: 1) includes information on Guam's youth access laws and federal law regarding sale of tobacco to youth. 2) provides specific strategies for how they can comply with the Guam youth access laws; and 3) highlights the health effects of tobacco use.

- Incentives for merchants who are in compliance (e.g., nonenforcement compliance checks in which compliant retailers are given positive reinforcement and noncompliant retailers are warned about youth access laws)

A certificate of compliance signed by the directors of GBHWC and DRT is immediately issued to retailers who passed the inspection.

- Community education regarding youth access laws

- a) GBHWC continues to support 1) tobacco control policy efforts to decrease youth access and increase cessation services to at-risk populations in the community; and 2) education, disseminations and environmental activities used to prevent tobacco sales to minors.
- b) Continue to conduct annual compliance inspections required by Synar. Inspection teams to include youth are required to attend prior protocols training that include rules, regulations, basic procedures and paper work required to be completed.

- Media use to publicize compliance inspection results

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

GBHWC Prevention and Training actively participates in all of Guam's NCD Consortium activities and are members of the Tobacco Control Action Team (TCAT).

- Other activities (*Please list.*) _____

Continued partnerships and collaborations with community stakeholders around tobacco control and education.

SYNAR SURVEY METHODS AND RESULTS

The following questions pertain to the survey methodology and results of the Synar survey used by the state to meet the requirements of the Synar Regulation in FFY 2019 (*see 42 U.S.C. 300x-26 and 45 C.F.R. 96.130*).

6. Has the sampling methodology changed from the previous year?

Yes No

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

a. If yes, describe how and when this change was communicated to SAMHSA

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

a. Did the state use the optional Synar Survey Estimation System (SSES) to analyze the Synar survey data?

Yes No

If Yes, upload a copy of SSES tables 1–8 (in Excel) to WebBGAS. Then go to Question 8. If No, continue to Question 7b.

b. Report the weighted and unweighted Retailer Violation Rate (RVR) estimates, the standard error, accuracy rate (number of eligible outlets divided by the total number of sampled outlets), and completion rate (number of eligible outlets inspected divided by the total number of eligible outlets).

Unweighted RVR _____

Weighted RVR _____

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

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

$$\text{RVR Estimate} + (1.645 \times \text{Standard Error}) = \text{Right Limit}$$

plus times

Accuracy rate _____

Completion rate _____

c. **Fill out Form 1 (See Appendix A: Forms 1–5 Templates).** *(Required regardless of the sample design.)*

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

Form 2 (Optional) (See Appendix A: Forms 1–5 Templates) *(Attach completed Form 2.)*

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

e. **If stratification was used, did any strata in the sample contain only one outlet or cluster this year?**

Yes No No stratification

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

f. **Was a cluster sample design used?**

Yes No

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

If No, go to Question 7g.

Were any certainty primary sampling units selected this year?

Yes No

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

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

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

h. **Fill out Form 4 (See Appendix A: Forms 1–5 Templates).**

8. Did the state's Synar survey use a list frame?

Yes No

If Yes, answer the following questions about its coverage.

a. The calendar year of the latest Sampling frame coverage study: 2011

b. Percent coverage from the latest Sampling frame coverage study: 98.3%

c. Was a new study conducted in this reporting period?

Yes No

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

d. The calendar year of the next coverage study planned: see response on section D waiver approved by SAMHSA on 6/14/2013 for FFY 2014 ASR

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

Yes No

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

a. If Yes, describe how and when this change was communicated to SAMHSA

FFY 2019 ASR that included raising youth access to 21 years of age pursuant to P.L. 34-01

b. Provide the inspection period: From 06/22/2019 to 07/13/2019

MM/DD/YY MM/DD/YY

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

13

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

d. Fill out and attach Form 5 in Appendix A (Forms 1–5). (Not required if the state used SSES to analyze the Synar survey data.)

SECTION II: FFY 2020 (Intended Use):

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

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

- Synar sampling methodology Yes No
Synar inspection protocol Yes No

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

2. Please describe the state's plans to maintain and/or reduce the target rate for Synar inspections to be completed in FFY 2020. Include a brief description of plans for law enforcement efforts to enforce youth tobacco access laws, activities that support law enforcement efforts to enforce youth tobacco access laws, and any anticipated changes in youth tobacco access legislation or regulation in the state.

Public Law 34-01- AN ACT TO AMMEND §6101(1) OF ARTICLE 1: §6302 OF ARTICLE 3: AND ARTICLE 4, ALL OF CHAPTER 6, TITLE 11, GUAM CODE ANNOTATED, RELATIVE TO CLARIFYING THE DEFINITION OF ELECTRONIC CIGARETTES, AND RAISING THE MINIMUM AGE OF LEGAL ACCESS TO TOBACCO PRODUCTS AND ELECTRONIC CIGARETTES TO TWENTY-ONE (21) YEARS: AND TO CITE THIS ACT AS THE "YOUTH PROTECTION ACT OF 2017" (Bill No. 9-34 (COR), Sponsor: B.J.F. Cruz | Passed: 3/09/17 – Lapsed into Law 3/24/17.

Public Law 34-35 "AN ACT TO ADD NEW ARTICLES 7 & 8 TO CHAPTER 6, TITLE 11, GUAM CODE ANNOTATED, RELATIVE TO DEFINING THE STAMP TAX ON CIGARETTES AND REQUIRING FOR THE PROPER AFFIXING OF STAMPS; AND AUTHORIZING THE DEPARTMENT OF REVENUE AND TAXATION TO PROMUGATE IMPLEMENTING REGULATIONS, "Bill No. 77-34 (COR) which lapsed into law on October 14, 2017.

Public Law 34-116 "AN ACT MAKING APPROPRIATIONS FOR THE OPERATIONS OF THE EXECUTIVE, LEGISLATIVE AND JUDICIAL BRANCHES OF THE GOVERNMENT OF GUAM FOR FISCAL YEAR ENDING SEPTEMBER 30, 2019, MAKING OTHER APPROPRIATIONS, AND ESTABLISHING MISCELLANEOUS AND ADMINISTRATIVE PROVISIONS, "Bill No. 323-34 (COR) was on the 11th day of August 2018, duly and regularly passed. Section 4 Tobacco Tax Increase, Subsections (a), (b) and (c) of § 26603, Article 6, Chapter 26, Title 11, Guam Code Annotated are hereby amended.

Bill 199-34 Relative to increasing the tobacco tax for prevention cessation, and data collection relative to tobacco use. This Act shall take effect 30 days after ratification by the voters of Guam in a referendum during the 2018 General Election.

P.L.35-47 (Bill No. 138-35) (COR) AN ACT TO AMEND § 90103 OF CHAPTER 90, TITLE 10, GUAM CODE ANNOTATED, RELATIVE TO EXPANDING THE *NATASHA PROTECTION ACT OF 2005* TO DEFINE AND PROHIBIT THE USE OF ELECTRONIC SMOKING DEVICES WHEREVER OTHER TOBACCO PRODUCTS ARE ALREADY PROHIBITED.

Successes that affect the youth: Continue to provide the Guam Department of Education with tobacco cessation trainings and printed resource materials to help users.

Community Empowerment successes: Continue to provide trainings to communities; a) Tobacco Control Enforcers Training; b) Brief Tobacco Intervention Skills certification; c) Tobacco Cessation Facilitator Training.

Community Engagement successes; Continue to conduct annual Synar compliance inspection.

3. Describe any challenges the state faces in complying with the Synar regulation. (Check all that apply and describe each challenge in the text box below it.)

- a. Limited resources for law enforcement of youth access laws

- b. Limited resources for activities to support enforcement and compliance with youth tobacco access laws

- c. Limitations in the state youth tobacco access laws

- d. Limited public support for enforcement of youth tobacco access laws

- e. Limitations on completeness/accuracy of list of tobacco outlets

GBHWC experienced some challenges with the new listing from the Department of Revenue and Taxation although we resolved the issues it proved to be quite challenging in verifying the tobacco outlets.

f. Limited expertise in survey methodology

g. Laws/regulations limiting the use of minors in tobacco inspections

h. Difficulties recruiting youth inspectors

i. Issues regarding the balance of inspections conducted by youth inspectors age 15 and under

j. Issues regarding the balance of inspections conducted by one gender of youth inspectors

k. Geographic, demographic, and logistical considerations in conducting inspections

l. Cultural factors (e.g., language barriers, young people purchasing for their elders)

m. Issues regarding sources of tobacco under tribal jurisdiction

n. Other challenges (*Please list.*) _____

APPENDIXES B & C: FORMS

Instructions

Appendix B (Sampling Design) and Appendix C (Inspection Protocol) are to reflect the state's CSAP-approved sampling design and inspection protocol. These appendixes, therefore, should generally describe the design and protocol and, with the exception of Question #10 of Appendix B, are not to be modified with year-specific information. Please note that any changes to either appendix must receive CSAP's advance, written approval. To facilitate the state's completion of this section, simply cut and paste the previously approved sampling design (Appendix B) and inspection protocol (Appendix C) and respond to Question #10 of Appendix B to provide the requested information about sample size calculations for the Synar survey conducted in FFY 2019.

APPENDIX B: SYNAR SURVEY SAMPLING METHODOLOGY

State: Guam
 FFY: 2020

1. What type of sampling frame is used?

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

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

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

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

Name of Frame Source	Type of Source	Description	Updating Method and Cycle
Tobacco License List	3	Under Public Law 24-278, a tobacco vendor or store must obtain a tobacco vendor license from the Guam Department of Revenue and Taxation in order to sell tobacco products.	The owner of the establishment wishing to sell tobacco products must complete an initial tobacco business license application form Guam Revenue and Taxation's General Licensing Branch that must be renewed annually.

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

a. Is any area left out in the formation of the area frame?

- Yes No

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

4. Federal regulation requires that vending machines be inspected as part of the Synar survey. Are vending machines included in the Synar survey?

- Yes No

If No, please indicate the reason(s) they are not included in the Synar survey. Please check all that apply.

- State law bans vending machines.
- State law bans vending machines from locations accessible to youth.
- State has a contract with the FDA and is actively enforcing the vending machine requirements of the Family Smoking Prevention and Tobacco Control Act.

Other (Please describe.) Public Law 34-01 § (a) vending machine selling tobacco products or electronic cigarettes shall be located so that they are only accessible to persons over the age of twenty-one (21) years, or are under constant, direct supervision and unobstructed line of sight of the person authorizing the installation or placement of the tobacco or electronic cigarette vending machine upon the premises he or she manages or otherwise controls, or his or her agent or employee. We have not seen vending machines selling tobacco products or electronic cigarettes here in Guam in the past 7 years.

If Yes, please indicate how likely it is that vending machines will be sampled.

- Vending machines are sampled separately to ensure vending machines are included in the sample
- Vending machines are sampled together with over the counter outlets, so it is possible that no vending machines were sampled, however they are included in the sampling frame and have a non-zero probability of selection
- Other reasons (Please describe.) _____

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

Census (STOP HERE: Appendix B is complete.)

Unstratified statewide sample:

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

Stratified sample:

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

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

7. Provide the following information about stratification.

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

[Empty box]

b. Is clustering used within the stratified sample?

Yes (Go to Question 8.)

No (Go to Question 9.)

8. Provide the following information about clustering.

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

[Empty box]

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

[Empty box]

9. Provide the following information about determining the Synar Sample.

a. Was the Synar Survey Estimation System (SSES) used to calculate the sample size?

Yes (Respond to part b.)

No (Respond to part c and Question 10c.)

b. SSES Sample Size Calculator used?

State Level (Respond to Question 10a.)

Stratum Level (Respond to Question 10a and 10b.)

c. Provide the formulas for determining the effective, target, and original outlet sample sizes.

[Empty box]

10. Provide the following information about sample size calculations for the Synar survey conducted in FFY 2019.

a. If the state uses the sample size formulas embedded in the SSES Sample Size Calculator to calculate the state level sample size, please provide the following information:

Inputs for Effective Sample Size:

RVR:

Frame Size:

Input for Target Sample Size:

Design Effect:

Inputs for Original Sample Size:

Safety Margin:

Accuracy (Eligibility) Rate:

Completion Rate:

- b. If the state uses the sample size formulas embedded in the SSES Sample Size Calculator to calculate the stratum level sample sizes, please provide the stratum level information:**

- c. If the state does not use the sample size formulas embedded in the SSES Sample Size Calculator, please provide all inputs required to calculate the effective, target, and original sample sizes as indicated in Question 9.**

APPENDIX C: SYNAR SURVEY INSPECTION PROTOCOL SUMMARY

State: Guam

FFY: 2020

Note: Upload to WebBGAS a copy of the Synar inspection form under the heading "Synar Inspection Form" and a copy of the protocol used to train inspection teams on conducting and reporting the results of the Synar inspections under the heading "Synar Inspection Protocol."

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

a. Consummated buy attempts?

- Required
 Permitted under specified circumstances (Describe: _____)
 Not permitted

b. Youth inspectors to carry ID?

- Required
 Permitted under specified circumstances (Describe: _____)
 Not permitted

c. Adult inspectors to enter the outlet?

- Required
 Permitted under specified circumstances (Describe: _____)
 Not permitted

d. Youth inspectors to be compensated?

- Required
 Permitted under specified circumstances (Describe: _____)
 Not permitted

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

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

List the agency name(s): Guam Behavioral Health and Wellness Center, Guam Department of Revenue and Taxation and community volunteers.

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

Always Usually Sometimes Rarely Never

4. Describe the type of tobacco products that are requested during Synar inspections.

a. What type of tobacco products are requested during the inspection?

- Cigarettes
- Small Cigars
- Cigarillos
- Smokeless Tobacco
- Electronic Cigarettes/Electronic Nicotine Delivery Systems (ENDS)
- Other

b. Describe the protocol for identifying what types of products and what brands of products are requested during an inspection.

During Synar training, youth inspectors choose a brand of cigarette that will be asked for during the inspections. Youth inspectors were also trained to list their products being offered by the establishment such as smokeless tobacco, cigars, electronic cigarettes. Cigarettes are still the most common form of tobacco sold in Guam.

5a. Describe the methods used to recruit, select, and train adult supervisors.

GBHWC's Prevention and Training Branch recruits' staff from GBHWC, FDA coordinators and back up coordinators, Guam Department of Revenue and Taxation and the community to be trained as adult supervisors.

5b. Describe the methods used to recruit, select, and train youth inspectors.

Youth inspectors are recruited through youth organizations, groups, schools and through word of mouth.

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

a. Legal

Yes No

(If Yes, please describe.)

Stipulated in Section 6120 of Guam P.L., 24-278 states that "Participation in these enforcement activities by a minor shall not constitute a violation of Section 6 1 1 6 of this Chapter, and the minor is immune from prosecution or penalties thereunder, or under any other provision of law prohibiting the purchase of these products by minors".

b. Procedural

Yes No

(If Yes, please describe.)

Guam's Manual of Procedures includes a section on "Legal Consolidations" which address issues related to confidentiality, protection of minors' identities, immunity for youth inspectors, and non-involvement of youth inspectors of legal proceedings arising from the inspections process.

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

a. Legal

Yes No

(If Yes, please describe.)

b. Procedural

Yes No

(If Yes, please describe.)

Guam's Manual of Procedures emphasizes the importance of ensuring the safety of youth inspectors throughout the inspection process. Specifically, youth inspectors are instructed to never venture into any establishment where they may feel unsafe, and to retreat immediately if upon entry into a store, they have a reason to feel uncomfortable or unsafe. In addition, Guam's Manual of Procedures make it mandatory for adult inspectors to always be within the vicinity of a youth inspector during an attempted buy.

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

a. Legal

Yes No

(If Yes, please describe.)

Guam P.L. 24-278 6120 outlines all of the legal requirements relating to the conduct of inspections, including the enlistment of youth inspectors from ages 12-17, the necessity for parental consent in writing, the right to use video recording equipment during inspections, the necessity to avoid entrapment by mandating all youth inspectors to answer truthfully when asked about their age, the need for adult supervision of all youth inspectors, and the role of the adult inspector in informing the vendor of non-compliance with the law after the youth inspector has left the premises.

Guam P.L. 34-01 (The Youth Protection Act of 2017) prohibits the sale of tobacco products to persons under 21 years of age.

b. Procedural

Yes No

(If Yes, please describe.)

Guam's Manual of Procedures outlines in detail the requirements for inspection, consistent with the law and with recommended SAMHSA protocols. One item to note is that the Manual of Procedures prescribes the recruitment of youth inspectors aged 14-17, consistent with federal guidelines, although Guam's law allows for youth as young as 12 to participate.

Guam P.L. 34-01 (The Youth Protection Act of 2017) prohibits the sale of tobacco products to persons under 21 years of age. Guam now recruits youth inspectors from ages 15-20 years of age to participate in the Annual Synar Compliance Check Inspections.

APPENDIX D: LIST SAMPLING FRAME COVERAGE STUDY

(LIST FRAME ONLY)

State: Guam
FFY: 2020

1. Calendar year of the coverage study: "SAMHSA approved 'Complete waiver of the Synar coverage study requirement' on 6/14/2013"

2. a. Unweighted percent coverage found: _____ %
b. Weighted percent coverage found: _____ %
c. Number of outlets found through canvassing: _____
d. Number of outlets matched on the list frame: _____

3. a. Describe how areas were defined. (e.g., census tracts, counties, etc.)

b. Were any areas of the state excluded from sampling?

Yes No

If Yes, please explain.

4. Please answer the following questions about the selection of canvassing areas.

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

Census (Go to Question 6.)

Unstratified statewide sample:

Simple random sample (Respond to Part b.)

Systematic random sample (Respond to Part b.)

Single-stage cluster sample (Respond to Parts b and d.)

Multistage cluster sample (Respond to Parts b and d.)

Stratified sample:

Simple random sample (Respond to Parts b and c.)

Systematic random sample (Respond to Parts b and c.)

Single-stage cluster sample (Respond to Parts b, c, and d.)

Multistage cluster sample (Respond to Parts b, c, and d.)

Other (Please describe and respond to Part b.) _____

b. Describe the sampling methods.

c. Provide a full description of the strata that were created.

d. Provide a full description of how clusters were formed.

5. Were borders of the selected areas clearly identified at the time of canvassing?

Yes No

6. Were all sampled areas visited by canvassing teams?

Yes (*Go to Question 7.*) No (*Respond to Parts a and b.*)

a. Was the subset of areas randomly chosen?

Yes No

b. Describe how the subsample of visited areas was drawn. Include the number of areas sampled and the number of areas canvassed.

7. Were field observers provided with a detailed map of the canvassing areas?

Yes No

If No, describe the canvassing instructions given to the field observers.

8. Were field observers instructed to find all outlets in the assigned area?

Yes No

If No, respond to Question 9.

If Yes, describe any instructions given to the field observers to ensure the entire area was canvassed, then go to Question 10.

9. If a full canvassing was not conducted:

a. How many predetermined outlets were to be observed in each area? _____

b. What were the starting points for each area? _____

c. Were these starting points randomly chosen?

Yes No

d. Describe the selection of the starting points.

e. Please describe the canvassing instructions given to the field observers, including predetermined routes.

10. Describe the process field observers used to determine if an outlet sold tobacco.

11. Please provide the state's definition of "matches" or "mismatches" to the Synar sampling frame? (e.g., address, business name, business license number)

12. Provide the calculation of the weighted percent coverage (if applicable).

SSES Table 1 (Synar Survey Estimates and Sample Sizes)

CSAP-SYNAR REPORT

State	GU
Federal Fiscal Year (FFY)	2020
Date	11/25/2019 16:24
Data	SSEsv7_DataEntryTemplate_SRS.xlsx
Program Version	Version 7.0
Analysis Option	Stratified SRS with FPC

Estimates

Unweighted Retailer Violation Rate	0.0%
Weighted Retailer Violation Rate	0.0%
Standard Error	0.0%
Is SAMHSA Precision Requirement met?	YES
Right-sided 95% Confidence Interval	[0.0%, 0.0%]
Two-sided 95% Confidence Interval	[0.0%, 0.0%]
Design Effect	1.0
Accuracy Rate (unweighted)	99.4%
Accuracy Rate (weighted)	99.4%
Completion Rate (unweighted)	99.4%

Sample Size for Current Year

Effective Sample Size	329
Target (Minimum) Sample Size	329
Original Sample Size	329
Eligible Sample Size	327
Final Sample Size	325
Overall Sampling Rate	99.4%

SSES Table 2 (Synar Survey Results by Stratum and by OTC/VM)

STATE: GU

FFY: 2020

Samp. Stratum	Var. Stratum	Outlet Frame Size	Estimated Outlet Population Size	Number of PSU Clusters Created	Number of PSU Clusters in Sample	Outlet Sample Size	Number of Eligible Outlets in Sample	Number of Sample Outlets Inspected	Number of Sample Outlets in Violation	Retailer Violation Rate(%)	Standard Error(%)
All Outlets											
1	1	329	327	N/A	N/A	329	327	325	0	0.0%	
Total		329	327			329	327	325	0	0.0%	0.0%
Over the Counter Outlets											
1	1	329	327	N/A	N/A	329	327	325	0	0.0%	
Total		329	327			329	327	325	0	0.0%	0.0%
Vending Machines											
1	1	0	0	N/A	N/A	0	0	0	0	0.0%	
Total		0	0			0	0	0	0	0.0%	0.0%

SSES Table 3 (Synar Survey Sample Tally Summary)

STATE: GU
FFY: 2020

Disposition Code	Description	Count	Subtotal
EC	Eligible and inspection complete outlet	325	
Total (Eligible Completes)			325
N1	In operation but closed at time of visit	2	
N2	Unsafe to access	0	
N3	Presence of police	0	
N4	Youth inspector knows salesperson	0	
N5	Moved to new location but not inspected	0	
N6	Drive thru only/youth inspector has no drivers license	0	
N7	Tobacco out of stock	0	
N8	Run out of time	0	
N9	Other noncompletion	0	
Total (Eligible Noncompletes)			2
I1	Out of Business	1	
I2	Does not sell tobacco products	0	
I3	Inaccessible by youth	0	
I4	Private club or private residence	0	
I5	Temporary closure	0	
I6	Can't be located	1	
I7	Wholesale only/Carton sale only	0	
I8	Vending machine broken	0	
I9	Duplicate	0	
I10	Other ineligibility	0	
Total (Ineligibles)			2
Grand Total			329

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

STATE: GU
FFY: 2020

Frequency Distribution

Gender	Age	Number of Inspectors	Attempted Buys	Successful Buys
Male	14	0	0	0
	15	0	0	0
	16	2	55	0
	17	3	45	0
	18	1	16	0
	19	1	24	0
	20	0	0	0
	Subtotal		7	140
Female	14	0	0	0
	15	0	0	0
	16	2	38	0
	17	2	73	0
	18	2	74	0
	19	0	0	0
	20	0	0	0
	Subtotal		6	185
Other		0	0	0
Grand Total		13	325	0

Buy Rate in Percent by Age and Gender

Age	Male	Female	Total
14	0.0%	0.0%	0.0%
15	0.0%	0.0%	0.0%
16	0.0%	0.0%	0.0%
17	0.0%	0.0%	0.0%
18	0.0%	0.0%	0.0%
19	0.0%	0.0%	0.0%
20	0.0%	0.0%	0.0%
Other			0.0%
Total	0.0%	0.0%	0.0%

Type of Product (Cigarettes (1), Small Cigars/Cigarrillos (2),

Smokeless Tobacco (3),

ENDS (4),

Other (5)) Retail Outl./Clerk asked

Outlet ID	Sampling S	Population Variance	Si	Population Response	[Violation	F	Outlet Typ	Youth Insp	Youth Insp	Youth Insp	VM Frame	Other (5))	Retail Outl./Clerk asked
1	1	329	1	329	EC	0	OTC	913	M	18	0	1	7
2	1	329	1	329	EC	0	OTC	912	F	16	0	1	7
3	1	329	1	329	EC	0	OTC	912	F	16	0	1	7
4	1	329	1	329	EC	0	OTC	913	M	18	0	1	7
5	1	329	1	329	EC	0	OTC	913	M	18	0	1	7
6	1	329	1	329	EC	0	OTC	912	F	16	0	1	7
7	1	329	1	329	EC	0	OTC	913	M	18	0	1	7
8	1	329	1	329	EC	0	OTC	912	F	16	0	1	7
9	1	329	1	329	EC	0	OTC	913	M	18	0	1	7
10	1	329	1	329	EC	0	OTC	913	M	18	0	1	7
11	1	329	1	329	EC	0	OTC	912	F	16	0	1	7
12	1	329	1	329	EC	0	OTC	913	M	18	0	1	7
13	1	329	1	329	EC	0	OTC	912	F	16	0	1	7
14	1	329	1	329	EC	0	OTC	913	M	18	0	1	7
15	1	329	1	329	EC	0	OTC	913	M	18	0	1	7
16	1	329	1	329	EC	0	OTC	912	F	16	0	1	7
17	1	329	1	329	EC	0	OTC	913	M	18	0	1	7
18	1	329	1	329	EC	0	OTC	913	M	18	0	1	7
19	1	329	1	329	EC	0	OTC	913	M	18	0	1	7
20	1	329	1	329	EC	0	OTC	912	F	16	0	1	7
21	1	329	1	329	EC	0	OTC	913	M	18	0	1	7
22	1	329	1	329	EC	0	OTC	912	F	16	0	1	7
23	1	329	1	329	EC	0	OTC	913	M	18	0	1	7

24	1	329	1	329	EC	0	OTC	912	F	16	0	1	7	Y
25	1	329	1	329	EC	0	OTC	912	F	16	0	1	7	Y
26	1	329	1	329	EC	0	OTC	913	M	18	0	1	7	Y
27	1	329	1	329	EC	0	OTC	913	M	18	0	1	7	Y
28	1	329	1	329	EC	0	OTC	912	F	16	0	1	7	Y
29	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
30	1	329	1	329	EC	0	OTC	916	F	17	0	1	5	Y
31	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
32	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
33	1	329	1	329	EC	0	OTC	916	F	17	0	1	5	Y
34	1	329	1	329	EC	0	OTC	916	F	17	0	1	5	Y
35	1	329	1	329	EC	0	OTC	916	F	17	0	1	5	Y
36	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
37	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
38	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
39	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
40	1	329	1	329	EC	0	OTC	916	F	17	0	1	5	Y
41	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
42	1	329	1	329	EC	0	OTC	916	F	17	0	1	5	Y
43	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
44	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
45	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
46	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
47	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
48	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	N
49	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
50	1	329	1	329	EC	0	OTC	916	F	17	0	98	7	98
51	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
52	1	329	1	329	N1	0	OTC	916	F	17	0	98	7	98
53	1	329	1	329	EC	0	OTC	920	F	18	0	1	1	Y
54	1	329	1	329	EC	0	OTC	920	F	18	0	1	7	Y
55	1	329	1	329	EC	0	OTC	920	F	18	0	1	7	Y
56	1	329	1	329	EC	0	OTC	920	F	18	0	1	7	Y
57	1	329	1	329	EC	0	OTC	920	F	18	0	1	7	Y
58	1	329	1	329	EC	0	OTC	920	F	18	0	1	5	Y
59	1	329	1	329	EC	0	OTC	920	F	18	0	1	1	Y
60	1	329	1	329	EC	0	OTC	920	F	18	0	98	7	98
61	1	329	1	329	EC	0	OTC	920	F	18	0	1	7	Y
62	1	329	1	329	EC	0	OTC	920	F	18	0	1	7	Y
63	1	329	1	329	EC	0	OTC	920	F	18	0	1	7	Y

104	1	329	1	329	1	329	1	329	EC	0	OTC	924	F	18	0	1	7	Y
105	1	329	1	329	EC	0	OTC	924	F	18	0	1	7	Y				
106	1	329	1	329	EC	0	OTC	924	F	18	0	1	7	Y				
107	1	329	1	329	EC	0	OTC	924	F	18	0	1	7	Y				
108	1	329	1	329	EC	0	OTC	929	M	16	0	1	7	Y				
109	1	329	1	329	EC	0	OTC	929	M	16	0	1	7	Y				
110	1	329	1	329	EC	0	OTC	929	M	16	0	98	7	98				
111	1	329	1	329	EC	0	OTC	929	M	16	0	1	7	Y				
112	1	329	1	329	EC	0	OTC	929	M	16	0	1	7	Y				
113	1	329	1	329	EC	0	OTC	929	M	16	0	1	7	Y				
114	1	329	1	329	EC	0	OTC	929	M	16	0	1	7	Y				
115	1	329	1	329	EC	0	OTC	929	M	16	0	1	1	Y				
116	1	329	1	329	EC	0	OTC	929	M	16	0	98	7	98				
117	1	329	1	329	EC	0	OTC	929	M	16	0	1	7	Y				
118	1	329	1	329	EC	0	OTC	929	M	16	0	1	7	Y				
119	1	329	1	329	EC	0	OTC	929	M	16	0	1	7	Y				
120	1	329	1	329	EC	0	OTC	929	M	16	0	1	7	Y				
121	1	329	1	329	EC	0	OTC	928	F	17	0	1	7	Y				
122	1	329	1	329	EC	0	OTC	928	F	17	0	1	1	Y				
123	1	329	1	329	EC	0	OTC	928	F	17	0	1	7	Y				
124	1	329	1	329	EC	0	OTC	928	F	17	0	1	7	Y				
125	1	329	1	329	EC	0	OTC	928	F	17	0	1	7	Y				
126	1	329	1	329	EC	0	OTC	928	F	17	0	1	7	Y				
127	1	329	1	329	EC	0	OTC	928	F	17	0	1	7	Y				
128	1	329	1	329	EC	0	OTC	928	F	17	0	1	1	Y				
129	1	329	1	329	EC	0	OTC	928	F	17	0	1	7	Y				
130	1	329	1	329	EC	0	OTC	928	F	17	0	1	7	Y				
131	1	329	1	329	EC	0	OTC	928	F	17	0	1	7	Y				
132	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	98				
133	1	329	1	329	EC	0	OTC	934	M	19	0	1	7	Y				
134	1	329	1	329	EC	0	OTC	933	M	16	0	1,3	7	Y				
135	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	Y				
136	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	Y				
137	1	329	1	329	EC	0	OTC	934	M	19	0	1	7	Y				
138	1	329	1	329	11	0	OTC	933	M	16	0	98	7	98				
139	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	98				
140	1	329	1	329	EC	0	OTC	934	M	19	0	1,3	7	N				
141	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	Y				
142	1	329	1	329	EC	0	OTC	934	M	19	0	1	7	Y				
143	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	Y				

144	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	Y
145	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	98	7	98
146	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	1,2,3,4	7	Y
147	1	329	1	329	1	329	EC	0	OTC	934	M	19	0	1,3	7	Y
148	1	329	1	329	1	329	EC	0	OTC	934	M	19	0	1	5	Y
149	1	329	1	329	1	329	EC	0	OTC	934	M	19	0	1,2,3,4	7	Y
150	1	329	1	329	1	329	EC	0	OTC	934	M	19	0	1,3,4	1	Y
151	1	329	1	329	1	329	16	0	OTC	933	M	16	0	98	5	98
152	1	329	1	329	1	329	EC	0	OTC	934	M	19	0	1	7	Y
153	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	Y
154	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	Y
155	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	Y
156	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	Y
157	1	329	1	329	1	329	EC	0	OTC	912	F	16	0	1	7	Y
158	1	329	1	329	1	329	EC	0	OTC	912	F	16	0	1	7	Y
159	1	329	1	329	1	329	EC	0	OTC	932	F	16	0	1	7	Y
160	1	329	1	329	1	329	EC	0	OTC	932	F	16	0	1	7	Y
161	1	329	1	329	1	329	EC	0	OTC	912	F	16	0	1	7	Y
162	1	329	1	329	1	329	EC	0	OTC	932	F	16	0	1	7	Y
163	1	329	1	329	1	329	EC	0	OTC	912	F	16	0	1	7	Y
164	1	329	1	329	1	329	EC	0	OTC	932	F	16	0	1	6	N
165	1	329	1	329	1	329	EC	0	OTC	932	F	16	0	1	7	Y
166	1	329	1	329	1	329	EC	0	OTC	932	F	16	0	1	5	Y
167	1	329	1	329	1	329	EC	0	OTC	912	F	16	0	1	7	Y
168	1	329	1	329	1	329	EC	0	OTC	932	F	16	0	1	1	Y
169	1	329	1	329	1	329	EC	0	OTC	912	F	16	0	1	1	Y
170	1	329	1	329	1	329	EC	0	OTC	932	F	16	0	1	5	Y
171	1	329	1	329	1	329	EC	0	OTC	912	F	16	0	1	7	N
172	1	329	1	329	1	329	EC	0	OTC	932	F	16	0	1	7	Y
173	1	329	1	329	1	329	EC	0	OTC	912	F	16	0	1	5	Y
174	1	329	1	329	1	329	EC	0	OTC	932	F	16	0	1	7	Y
175	1	329	1	329	1	329	EC	0	OTC	912	F	16	0	1	7	Y
176	1	329	1	329	1	329	EC	0	OTC	932	F	16	0	1	7	Y
177	1	329	1	329	1	329	EC	0	OTC	912	F	16	0	1	7	Y
178	1	329	1	329	1	329	EC	0	OTC	932	F	16	0	1	7	Y
179	1	329	1	329	1	329	EC	0	OTC	912	F	16	0	1	7	Y
180	1	329	1	329	1	329	N1	0	OTC	912	F	16	0	98	7	98
181	1	329	1	329	1	329	EC	0	OTC	912	F	16	0	1	7	Y
182	1	329	1	329	1	329	EC	0	OTC	912	F	16	0	1	7	Y
183	1	329	1	329	1	329	EC	0	OTC	912	F	16	0	1	7	Y

184	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
185	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	98	7	Y
186	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
187	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
188	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	98	3	98
189	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	1	Y
190	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	1	Y
191	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	N
192	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
193	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	1	Y
194	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	5	Y
195	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
196	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	N
197	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	N
198	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
199	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
200	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
201	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	N
202	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
203	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	98	7	98
204	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
205	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
206	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	1	7	Y
207	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	98	7	98
208	1	329	1	329	1	329	EC	0	OTC	916	F	17	0	98	7	98
209	1	329	1	329	1	329	EC	0	OTC	917	M	17	0	1	7	Y
210	1	329	1	329	1	329	EC	0	OTC	921	M	17	0	1	7	Y
211	1	329	1	329	1	329	EC	0	OTC	917	M	17	0	1	7	Y
212	1	329	1	329	1	329	EC	0	OTC	921	M	17	0	1	7	Y
213	1	329	1	329	1	329	EC	0	OTC	917	M	17	0	98	7	98
214	1	329	1	329	1	329	EC	0	OTC	921	M	17	0	1	7	Y
215	1	329	1	329	1	329	EC	0	OTC	917	M	17	0	1	7	Y
216	1	329	1	329	1	329	EC	0	OTC	921	M	17	0	98	7	98
217	1	329	1	329	1	329	EC	0	OTC	917	M	17	0	1	7	Y
218	1	329	1	329	1	329	EC	0	OTC	921	M	17	0	1	7	Y
219	1	329	1	329	1	329	EC	0	OTC	917	M	17	0	1	7	Y
220	1	329	1	329	1	329	EC	0	OTC	921	M	17	0	98	7	98
221	1	329	1	329	1	329	EC	0	OTC	917	M	17	0	1	7	Y
222	1	329	1	329	1	329	EC	0	OTC	921	M	17	0	1	7	Y
223	1	329	1	329	1	329	EC	0	OTC	917	M	17	0	1	7	98

224	1	329	1	329	1	329	EC	0	OTC	921	M	17	0	98	7	98
225	1	329	1	329	1	329	EC	0	OTC	917	M	17	0	1	7	Y
226	1	329	1	329	1	329	EC	0	OTC	921	M	17	0	1	7	Y
227	1	329	1	329	1	329	EC	0	OTC	917	M	17	0	98	7	98
228	1	329	1	329	1	329	EC	0	OTC	921	M	17	0	1	7	Y
229	1	329	1	329	1	329	EC	0	OTC	917	M	17	0	1	7	Y
230	1	329	1	329	1	329	EC	0	OTC	921	M	17	0	1	7	Y
231	1	329	1	329	1	329	EC	0	OTC	917	M	17	0	1	7	Y
232	1	329	1	329	1	329	EC	0	OTC	921	M	17	0	1	7	Y
233	1	329	1	329	1	329	EC	0	OTC	917	M	17	0	1	7	Y
234	1	329	1	329	1	329	EC	0	OTC	917	M	17	0	98	7	Y
235	1	329	1	329	1	329	EC	0	OTC	917	M	17	0	1	98	98
236	1	329	1	329	1	329	EC	0	OTC	921	M	17	0	1	7	Y
237	1	329	1	329	1	329	EC	0	OTC	917	M	17	0	1	7	Y
238	1	329	1	329	1	329	EC	0	OTC	921	M	17	0	1	7	Y
239	1	329	1	329	1	329	EC	0	OTC	917	M	17	0	1	7	Y
240	1	329	1	329	1	329	EC	0	OTC	925	M	17	0	1	7	Y
241	1	329	1	329	1	329	EC	0	OTC	924	F	18	0	1	7	Y
242	1	329	1	329	1	329	EC	0	OTC	924	F	18	0	1	7	Y
243	1	329	1	329	1	329	EC	0	OTC	924	F	18	0	1	7	Y
244	1	329	1	329	1	329	EC	0	OTC	925	M	17	0	1	1	Y
245	1	329	1	329	1	329	EC	0	OTC	924	F	18	0	1	7	Y
246	1	329	1	329	1	329	EC	0	OTC	924	F	18	0	1	7	Y
247	1	329	1	329	1	329	EC	0	OTC	924	F	18	0	1	7	Y
248	1	329	1	329	1	329	EC	0	OTC	924	F	18	0	1	7	Y
249	1	329	1	329	1	329	EC	0	OTC	924	F	18	0	1	7	Y
250	1	329	1	329	1	329	EC	0	OTC	925	M	17	0	1	7	Y
251	1	329	1	329	1	329	EC	0	OTC	924	F	18	0	1	7	Y
252	1	329	1	329	1	329	EC	0	OTC	925	M	17	0	1	7	Y
253	1	329	1	329	1	329	EC	0	OTC	924	F	18	0	1	7	Y
254	1	329	1	329	1	329	EC	0	OTC	924	F	18	0	1	1	Y
255	1	329	1	329	1	329	EC	0	OTC	925	M	17	0	1	7	98
256	1	329	1	329	1	329	EC	0	OTC	924	F	18	0	1	7	Y
257	1	329	1	329	1	329	EC	0	OTC	925	M	17	0	1	7	Y
258	1	329	1	329	1	329	EC	0	OTC	924	F	18	0	1	7	Y
259	1	329	1	329	1	329	EC	0	OTC	924	F	18	0	1	7	Y
260	1	329	1	329	1	329	EC	0	OTC	925	M	17	0	1	5	Y
261	1	329	1	329	1	329	EC	0	OTC	924	F	18	0	1	7	Y
262	1	329	1	329	1	329	EC	0	OTC	925	M	17	0	1	7	Y
263	1	329	1	329	1	329	EC	0	OTC	924	F	18	0	98	7	98

304	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	Y
305	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	Y
306	1	329	1	329	1	329	EC	0	OTC	934	M	19	0	1	7	Y
307	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	1	5	Y
308	1	329	1	329	1	329	EC	0	OTC	934	M	19	0	1	1	Y
309	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	98	7	Y
310	1	329	1	329	1	329	EC	0	OTC	934	M	19	0	1	7	Y
311	1	329	1	329	1	329	EC	0	OTC	934	M	19	0	98	7	98
312	1	329	1	329	1	329	EC	0	OTC	934	M	19	0	1	7	Y
313	1	329	1	329	1	329	EC	0	OTC	934	M	19	0	98	7	98
314	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	Y
315	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	Y
316	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	Y
317	1	329	1	329	1	329	EC	0	OTC	934	M	19	0	1	7	Y
318	1	329	1	329	1	329	EC	0	OTC	934	M	19	0	1	7	Y
319	1	329	1	329	1	329	EC	0	OTC	934	M	19	0	1	7	N
320	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	Y
321	1	329	1	329	1	329	EC	0	OTC	934	M	19	0	1	1	Y
322	1	329	1	329	1	329	EC	0	OTC	934	M	19	0	1	7	Y
323	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	Y
324	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	Y
325	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	1,5	7	Y
326	1	329	1	329	1	329	EC	0	OTC	934	M	19	0	1	7	Y
327	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	1	7	Y
328	1	329	1	329	1	329	EC	0	OTC	934	M	19	0	1	7	Y
329	1	329	1	329	1	329	EC	0	OTC	933	M	16	0	98	98	98

