

Priority area(s): Reducing Youth Access

Priority Topic: Youth Tobacco Purchase Survey

Case Study	Dose Response	Longitudinal
Pre/Post - Case Control	Repeated Measures	Case Control with intact groups
Cross-Sectional	Formative Research	Other

Agency name LA Link

Project Name Citizen Citation Project to Increase Voluntary Compliance with STAKE Act

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CITIZEN CITATIONS ISSUED TO MERCHANTS PROVE TO BE AN EFFECTIVE COMMUNITY INTERVENTION TO REDUCE TOBACCO SALES TO MINORS

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ABSTRACT

To increase voluntary compliance with the California State law, Stop Tobacco Access to Kids Enforcement (STAKE) Act (enabling legislation to comply with the Federal Synar amendment), California communities have implemented unique approaches to reduce the rate of illegal sales of tobacco to minors.

L.A. LINK's Citizen Citation project is the community action "brainchild" of 15 youth and adult tobacco prevention advocates living in the region of Los Angeles (L.A.) County. Eighty youth were trained as investigators, merchant compliance surveyors, community leader educators, and media spokespersons during this 5-month, two-phased project. Citizen Citations proved to be an effective, hard-hitting tool to motivate merchants to reduce the rate of illegal sales of cigarettes to minors and to take additional steps to comply with other mandates of the STAKE Act.

Citizen Citations resembled parking tickets; however, the stated "infractions" were consistent with STAKE Act requirements (e.g. single cigarettes are sold, required signage is not posted, cigarette sales to minors were permitted). The following project components were critical to project outcomes and success and enabled L.A. LINK to document the effectiveness of Citizen Citations in reducing the rate of illegal sales of cigarettes to minors:

- Components of the project were designed, in part, by stakeholder-advocates from the target communities.
- The training protocol was sensitive to and varied according to community needs and norms yet had enough similarity to maintain the reliability and validity of data collection and evaluation findings.
- Intervention materials (data collection forms) attracted youth, generated a response reaction by the target population, and were easily used by the evaluators.
- Youth and adults with previous experience in conducting community surveys formed the advocate "critical mass" to obtain a statistically significant number of surveys.
- The facilitating agency (L.A. LINK) responded to complaints from merchants, protected the anonymity of advocates, ensured that the evaluation protocol was followed, worked with an independent evaluator to obtain unbiased analyses of

findings, and compared findings to ongoing local and statewide sales-to-minors tracking data and STAKE Act compliance efforts.

BACKGROUND

In 1994, L.A. LINK conducted its first regional survey to document the illegal sales rate of tobacco to minors. The survey found that more than 64 percent of merchants in Los Angeles County were willing to sell tobacco to minors. In some communities, 80 percent of merchants were willing to do so.

Although it had been illegal in California to sell tobacco to minors for more than 100 years (Penal Code 308), the law was largely unenforced. In a 1995 community opinion survey of more than 4,300 youth in L.A. County, L.A. LINK discovered that youth were incensed that merchants were not held accountable for illegally selling tobacco to minors. L.A. LINK convened a small group of youth and adult advocates expressly to arrive at a community intervention that would:

1. Empower youth to play a vital role in holding merchants accountable for illegal sales to minors.
2. Alert merchants that their communities were concerned, knowledgeable, willing to take action regarding illegal sales of tobacco to minors.
3. Provide merchants with materials about the recently enacted STAKE Act.
4. Implement a media activity that would reach, involve, and attract the attention of community leaders and law enforcement personnel to encourage continued enforcement efforts.

The Citizen Citation project arose from this informal focus group session. Subsequently, the project was funded by the California Department of Health Services, Tobacco Control Section (CDHS-TCS) and was shaped by the following parameters.

PROJECT DESIGN AND IMPLEMENTATION

Citizen Citation project treatment and control groups were stores and merchants known to have recently sold tobacco to minors in 16 communities within L.A. County. In phase one, 14-to-16-year-old teens were recruited, were trained, and practiced the steps necessary to truthfully document merchants who were selling to minors. Teen advocates surveyed teen smokers to determine which stores sold to minors. The information was recorded by the teens onto the official Citizen Citations, which were collected by L.A. LINK staff. The 324 merchants identified through this process were randomized into treatment and control groups. Fifty percent of the stores (the treatment group) received the citation packet via certified mail. Citizen Citation packets contained a Citizen Citation, a [State of California] "No I.D., no sale" warning sign, a CDHS-TCS produced STAKE Act brochure, and a brief description of L.A. LINK. The youth and adult advocates were unaware of the

separation of stores into treatment and control groups and did not know that (for evaluation purposes) only 50 percent of the stores had received citation packets.

The second youth and adult training session required a slide presentation and role play covering the procedures and protocol to follow as youth/adult teams visited stores attempting to purchase tobacco to document merchant willingness to sell to minors. It was absolutely necessary to vary the training process. Communities with experienced advocates were not intimidated by the process or concept of step one (investigating which merchants to cite) of step two (conducting an attempted buy). Groups new to this type of advocacy effort required intensive training, not only on the protocol but on the community norm change; the to appropriateness" of "subjecting" merchants to this type of public humiliation; and the "ability" of youth to commit to a code of ethics prompting them to report only merchants who were honestly known to sell tobacco to minors. Three agencies that focus on ethnic-specific issues embraced skeptical opinions of either the methods of data collection or of the principle of youth holding merchants accountable. As a result data were either not collected by the participants or had to be discarded because of specious trends that prompted the evaluator to consider the data invalid.

In communities where advocates or their agencies had existing ties to advocacy projects, law enforcement, community leaders, or key decisionmakers, the training protocol included meeting with key individuals to garner support, gauge community readiness, plan for emergency response strategies, and maintain the integrity and similarity of project implementation from community to community within the target areas.

Buy-in from participants (excluding the three agencies dropped) was intensely high because materials, including the citation, were designed and approved by a work group of individuals representing most of the participating communities. Citizen Citations were (carbonless duplicates) were printed with sequential numbers for tracking and evaluation purposes. Additionally, parent or guardian consent forms, teen code of ethics forms, data collection forms, and safety procedures were all components of the planning process and training sessions. Agencies that were not part of the early planning and work group had more challenging training sessions and struggles with the norm change of youth actively holding merchants accountable for engaging in illegal practices.

During phase one, youth investigators identified stores known to sell tobacco to minors by soliciting information from teen smokers about where they purchased tobacco. Youth investigators signed a code of ethics so that merchants were not wrongfully included and to ensure that store names, once recorded on the citation, were kept confidential. Teen advocates were thrilled to assume the role of investigators and took very seriously the tasks of (1) identifying stores that sell tobacco to minors and (2) entering names of stores onto the citations, not duplicating stores within communities, and keeping information confidential.

Three weeks from the date that merchants in the treatment group received their citations (mailed from the L.A. LINK office), youth and adult participants were trained on an attempted purchase of tobacco protocol. Critical elements of the training were how to: (1) ask a merchant for a cigarette and then refuse to purchase it once it was offered for sale by

the merchant, (2) complete the survey form including recording whether single cigarettes are sold and whether STAKE Act signage is posted; (3) take safety precautions when entering and exiting a store. Role playing was the tool of choice for L.A. LINK trainers.

During this phase two training, the L.A. LINK office was deluged with calls from concerned, often incensed, and irate merchants who had received Citizen Citations. More than 30 calls were received by the office, some denying their store sold to minors, many wanting to know who was accusing them of this violation, others wanting to take L.A. LINK to court for false accusations, others contacting the Alcohol and Beverage Control for additional information on the law and the project, most wanting to know whether there was a fine involved with this violation, some requesting information and training material to assist employees with proper compliance with State law, and others detailing accounts of the vandalism and property damage to their stores if they did not sell to minors asking to buy cigarettes.

One to two weeks following the phase two training, youth and adult advocates cautiously, amidst this outcry from merchants, went into these stores (and into the stores that did not receive a citation), attempted to purchase cigarettes, and recorded all information on the data collection form. Immediately, participants noticed that some stores had STAKE Act signage posted (sent with the citations) and some did not. They could not believe, and were quite disappointed, that merchants were willing to sell or when they did not see the signage. Remember, they assumed that all stores had received the citation and material.

RESULTS AND LESSONS LEARNED

Merchants who received the Citizen Citation and information were three times as likely to have the mandatory STAKE Act signage posted than were merchants who did not receive the citation and information. They were also less likely to sell to minors. Of the 324 stores surveyed, 24.7 percent that received the intervention were willing to sell to minors compared with 32.8 percent of those that did not receive the intervention. The control group rate was also higher than the 1996 statewide sales rate of 29.3 percent (N=519). The results proved to be a dramatic illustration of a community-based intervention that worked. Following the press conference announcing the data, L.A. LINK sent a citation to the control group of merchants who had been willing to sell to minors (as documented by the attempted buy segment of this project). A smaller number of calls were received from merchants than when the citations had been sent the first time, but none denied the allegations. Most merchants requested information on how to comply with the law. Possibly coverage on L.A. area TV and radio, the press event could account for the relatively small number of merchants calling in denying or irate about the allegations.

The expressions of shock from stakeholders and merchants in this study were intense. When all the data were collected, L.A. LINK staff members told participants that because of the evaluation protocol, not all the stores had received the citation. This had been done to measure the success or failure of the citation. Staff had to explain this many times to the participants who were dismayed that L.A. LINK would not reveal the entire process of the investigation to them at the onset. Their feelings were assuaged only by the fact that the

study did prove the effectiveness of the citation and had controlled for bias in data collection. Participants were overjoyed with the results. Youth were exceptionally proud of their significant roles in the process.

Agencies and advocates interested in replicating the Citizen Citation project should be critically aware that:

- **It is advisable not to replicate this project in communities with populations of less than 100,000.** The minimum number of retail outlets to survey is 40 to 60.
- **Ensuring the anonymity of youth and agencies must be a priority.** The majority of merchants responding to the citation wanted to know who in their community was reporting them.
- **Training coordinating agency staff to field and record incoming calls from merchants is mandatory.** Also, it is critical to adopt a strategic damage control process to defuse merchant ire and allow merchants to understand the meaning of complying with existing law or making responsible contributions to the lives of their patrons.
- **Expect merchant outcry, and frame the descriptive language on the citation so that it is understood legally to be a warning with no official municipal ramifications.**
- **Send the citations to merchants via certified mail.** L.A. LINK had conducted merchant education activities in the past; however, none had such response from the merchants, many of whom were not the individuals who actually opened their mail. The certified envelope definitely reached the decisionmaker of the retail site.
- **Keep the evaluation procedures confidential.** Although this requires effort by the coordinating agency to smooth somewhat hurt feelings on the part of participants, it ensures unbiased treatment of both test and control merchants on the part of investigators and surveyors throughout the investigation and surveying activities.
- **Provide stipends or small incentives for participants.** This project is conducted over a 5 to month period and is very time consuming (two 3-to-4 hour trainings per group, 10 to 20 hours for each youth investigator researching culpable merchants and finding exact mailing addresses of each merchant, 3 to 5 hours per team completing the citations and returning them to the L.A. LINK office, 8 to 10 hours per team conducting attempted buy surveys, 3 to 5 hours cleaning and duplicating data sheets, and 6 to 10 hours preparing for and participating in followup media activities).

- **Conduct a press conference or media event to announce findings; and recognize that community collaboration is integral to the project's success and involves merchants, law enforcement personnel, and key community leaders.** L.A. LINK's press conference included outstanding comments from concerned merchants, committed law enforcement officers, the mayor, and city council members from target communities. One community coalition of leaders and law enforcement was committed to and has indeed continued to conduct independent assessments to lower its community's rate of sales of tobacco to minors; this is a true testament to the power of collaborative action and a relevant community intervention, the Citizen Citation, to change cultural norms.