



C.A.F.E. Practices Verification Organization Approval Procedure

Starbucks Coffee Company

V1.3

English Version

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1.0 INTRODUCTION

Skilled, qualified, and independent verification organizations are vital to the success of Starbucks Coffee Company's Coffee and Farmer Equity (C.A.F.E.) Practices Program. C.A.F.E. Practices is a voluntary supply chain program that provides purchasing preference to coffee suppliers¹ who supply coffee beans that are grown, processed, and traded in an economically, socially, and environmentally responsible manner, as defined by the C.A.F.E. Practices Generic Evaluation Guidelines. For this program to be credible and transparent, independent verification of program participants is required. The assessment and reporting of the economic, social and environmental profile of suppliers, coffee producers and processors, a process referred to as "verification," is conducted by third-party auditing organizations or "verification organizations."

To ensure the quality and consistency of auditing and reporting in the C.A.F.E. Practices program, Starbucks has contracted Scientific Certification Systems (SCS) as an independent third-party organization charged with approving and monitoring all parties wishing to conduct verification work in C.A.F.E. Practices. An independently administered approval process serves as an impartial way of evaluating an organization's capabilities and resources to conduct verification work, as well as provide excellent service to Starbucks' coffee suppliers. Only C.A.F.E. Practices verifications conducted by verification organizations approved by SCS will be recognized as valid by Starbucks.

This Verification Organization Approval Procedure document establishes the requirements necessary for interested parties to become approved verification organizations. The approval procedure is detailed in Section 3.0.

Before completing and submitting an application form to SCS, all interested parties should review this document, as well as all other C.A.F.E. Practices documents including the Verifier and Inspector Operations Manual, Generic Evaluation Guidelines, Generic and Smallholder Scorecards, and confirm that they meet the following requirements.

Independent

Verification organizations, verifiers, and their inspectors must not hold a financial interest in, be presently associated with, or have been employed by the entities they are verifying, without disclosing and describing the nature of such affiliations to SCS, to avoid any potential for a conflict of interest. If this information is disclosed to SCS, appropriate measures may be developed by the applicant organization to mitigate a potential conflict of interest. If the applicant chooses to withhold this information or refuses to acknowledge the potential for a conflict of interest, SCS may elect to deny the applicant provisionally approved status regardless of whether they have participated satisfactorily in an SCS approved C.A.F.E. Practices training. SCS will also review verification organization independence in the course of annual accreditation audits and it is expected that all personnel working for the verification organization on C.A.F.E. Practices verification work will sign declarations stating any affiliations that may be a conflict of interest.

Capable

Verification organizations must demonstrate to SCS that their organizational capabilities are sufficient to conduct internal report review and training, and provide the logistical support (i.e. telecommunications, computer and internet capabilities, reliable transportation, GPS units, etc.) required for verification work. Moreover, it must be demonstrated to SCS that all staff

¹ "Suppliers" are defined as those legal entities from whom Starbucks directly purchases green coffee. The Glossary in the back of the Verifiers Operations Manual offers more detailed definitions of key terms.

possess the skill and integrity to faithfully assess and report on the performance of supply chain entities, including coffee producers, processors, and in the case of smallholder networks, producer support organizations (PSOs), against the C.A.F.E. Practices evaluation criteria. Organizational capacity and the capacity of relevant personnel is determined on an ongoing basis through participation in trainings, office audits, desk audits of submitted reports and field audits of the work of verifiers and inspectors.

Qualified

Verifiers and their inspectors should possess technical expertise, work experience, and an educational background that reflect their ability to conduct rigorous auditing and reporting in accordance with the procedures laid out in the Verifier Operations Manual. Verifiers need to have a university level education or 5 years of relevant professional experience. Qualifications and credentials alone, however, do not determine whether a verifier or inspector is qualified for C.A.F.E. Practices verification work. Instead, SCS will judge the merits of verifiers and their inspectors based on frequent review of their work and their ability to offer their clients satisfactory verification services.

2.0 OVERVIEW OF C.A.F.E. PRACTICES

C.A.F.E. Practices is a voluntary supply chain program that provides purchasing preference to coffee suppliers² who supply coffee beans that are grown, processed, and traded in an economically, socially, and environmentally responsible manner, as defined by the C.A.F.E. Practices Generic Evaluation Guidelines. Participants must undergo verification and receive an overall aggregate score, ranging from 0-100%, which numerically represents their level of conformance with the economic, social, and environmental criteria set forth in the Generic Evaluation Guidelines. While verification organizations are responsible for evaluating supply chain entities participating C.A.F.E. Practices, scores are generated automatically in the Verifier Reporting System (VRS) and a corresponding status in the program is awarded by Starbucks Coffee Company. Based on the numerical results generated in the VRS through the entry of verification reports, each C.A.F.E. Practices supply chain may be awarded a status in the program as a verified, preferred, or strategic supplier. For more information on how status is determined, refer to section 9.0 of the Verifier and Inspector Operations Manual.

Starbucks developed C.A.F.E. Practices in collaboration with stakeholders including SCS and Conservation International and other non-profit organizations. The initial development began in 1998, and resulted in the Preferred Supplier Program (PSP) in 2001. The PSP program was enhanced with guidance from SCS and renamed C.A.F.E. Practices. SCS involvement with C.A.F.E. Practices officially began in 2004, with the launch of the program in Latin America. Interest in the program has increased over the past four years, along with the demand for verification services. As of March 2008, there are 28 verification organizations and over 160 inspectors conducting verifications in 19 countries.

There are four primary areas of focus in C.A.F.E. Practices. These include product quality, economic accountability, social responsibility, and environmental leadership. C.A.F.E. Practices evaluates social responsibility, environmental leadership, and economic accountability, while product quality and economic viability are prerequisites for participation in the program. The C.A.F.E. Practices evaluation contains 4 subject areas, including 29 criteria groups, made up of 207 indicators used to evaluate status in the program.

² “Suppliers” are defined as those legal entities from whom Starbucks directly purchases green coffee. The Glossary in the back of the Verifiers Operations Manual offers more detailed definitions of key terms.

3.0 ORGANIZATION APPROVAL PROCEDURE

To become an approved verification organization to conduct C.A.F.E. Practices verifications, the work of all new applicants must first be subjected to a thorough review by SCS. This requires that all applicants enter into a period of provisional approval status, during which time their performance is evaluated by SCS, before being granted fully approved status.

Provisional approval is awarded based on 1) a satisfactory application review and follow-up interview by SCS, 2) and satisfactory participation in a SCS approved training, including a quantitative assessment testing the verifiers' and, if applicable, their inspectors' aptitude to conduct verification work. Provisionally approved status allows verification organizations to engage in verification activities with up to three applicant supply chains seeking C.A.F.E. Practices status. To achieve fully approved status, provisionally approved verification organizations must undergo a SCS audit of their offices and be accompanied by a SCS auditor on one of their first three supply chain verifications.

Approved status is always conditioned on the verification organization's good standing in the program. A demonstrated inability to resolve outstanding Corrective Action Requests (CARs), evidence of fraudulent activities, a systematic lack of adherence to reporting protocols and deadlines, and problems with conflicts of interest may all result in a verification organization's immediate suspension from the C.A.F.E. Practices program. In some cases, reinstatement in the program may be conditioned on fulfilling outstanding obligations, while in others, suspended organizations may be required to reapply and undergo the entire application and approval process again. Thus, maintaining fully approved status in the program is an ongoing process, one that is dependent on verification organizations fulfilling all requirements expected of them per the Verifier Operations Manual. If SCS discovers that individual members of an organization's verification team are found not to uphold the standards of independent, capable and qualified verifiers and inspectors, and the incidences of non-conformances are isolated cases, SCS will issue CARs with the expectation that the verification organization in question will take appropriate measures to address these issues with their personnel to avoid compromising the overall quality of their work. If no such measures are taken as a result of CARs issued, or if the measures taken are deemed inadequate and ineffectual by SCS, the verification organization may be suspended until such time that the issues are addressed.

3.1 Application Process

Third-party organizations seeking to become approved to conduct Starbucks C.A.F.E. Practices verifications must formally apply to Scientific Certification Systems (SCS) by submitting a Verification Organization Application Form (Appendix 1) electronically to cafepactices@scscertified.com or via regular mail to:

CSR Purchasing and Supply Chain Programs,
Scientific Certification Systems,
2200 Powell St. Suite 725, Emeryville, CA 94608.

Upon receipt of a completed application, SCS will conduct an initial assessment of the verifier applicant's capacity to conduct verification work. The initial application review process entails:

- a desk audit of the application materials to ensure accuracy and truthfulness of submitted information;
- telephone interviews to assess professional capabilities and discuss credentials;
- verifier participation in a SCS approved Starbucks C.A.F.E. Practices verifier training session.

3.2 Provisional Approval

Should the application review and initial training prove satisfactory, the verifier will be granted provisional approval status, allowing them to conduct verifications of up to three C.A.F.E. Practices applicants until an initial office and field audit can be conducted by SCS. Provisional approval lasts 6 months or for three verification visits, whichever comes first, but can be extended for an additional 6 months at the discretion of SCS if the verifier has yet to secure a client.

Provisional approval for verification organizations extends only to the country for which the applicant organization has applied. Should the verification organization have multinational operations that they would like to have considered as independent verification organizations, an application needs to be submitted for each organization operating in a specific region (Africa, Latin America, and Asia Pacific).

3.3 Full Approval

Provisionally approved verifiers are expected to undergo an initial audit from SCS within their first three C.A.F.E. Practices verification visits, or within a time period specified by SCS. The SCS initial audit includes:

- an on-site audit of the verifier's business office or base of operations;
- a shadow audit (observation) of verification visits at the supplier, processor and producer levels;
- a subsequent assessment and evaluation of the verifier reports submitted in the VRS from the shadow audit.

Verifiers who remain in good standing during the provisional approval period and successfully undergo the initial audits, and resolve any Corrective Action Requests (CARs) from such audits in the time allotted to do so, will be granted status as fully approved verification organizations by SCS. This status allows verification organizations to conduct verification assessments of C.A.F.E. Practices applicants at will, in the regions and countries in which they are approved for work.

To maintain fully approved status, verification organizations must resolve all open CARs which may result from random desk and field audits of their submitted verification reports by the deadlines set by SCS. In addition, each fully approved verification organization must undergo an annual field audit conducted by SCS to ensure that verifiers and their inspectors are performing their work in accordance with the procedures outlined in the Verifier Operations Manual.

3.4 Suspension

In the event that verification organizations are approved by SCS, but fail to adhere to verification protocols outlined in the Verifier Operations Manual in the course of their verification duties, SCS may elect to suspend such organizations either with or without conditions for immediate reinstatement, depending on the severity of the non-conformance. Suspension of verification organizations may occur if CARs resulting from desk, office, and field audits are not resolved by verifiers before the corresponding deadlines, or if verification organizations fail to adhere to auditing and reporting procedures in addition to general procedures set forth in the Verifier Operations Manual. Contact information for suspended verification organizations will be immediately removed from the list of C.A.F.E. Practices approved verifiers.

3.5 List of C.A.F.E. Practices Approved Verifiers

The list of currently provisionally and fully approved verifiers is posted at http://www.scscertified.com/csrpurchasing/starbucks_approvedverifiers.html. The list will include contact information and geographic regions of operation for each approved verification organization, in order to allow participating coffee suppliers to contact approved verification organizations as the need arises. In the case of verification organization suspension, SCS will remove the contact information for the verification organization in question until such time that the organization is reinstated into the C.A.F.E. Practices program.

3.6 Cost

There is no application fee to become an approved verification organization. Except in cases of Starbucks sponsored verifier trainings and re-trainings, professional fees associated with SCS verification organization trainings will be paid by organizations receiving training. Travel and other out-of-pocket expenses for verifiers will be borne by the verification organization. Costs associated with SCS's initial and annual audits of all verification organizations will be paid by Starbucks Coffee Company.

4.0 SECURE HANDLING OF DOCUMENTS AND DISCLOSURE OF INFORMATION

All information pertaining to verification organizations, their clients, and relevant personnel should be handled in a secure and confidential manner. This applies to all parties involved in C.A.F.E. Practices, including verification organizations, SCS, and Starbucks Coffee Company. The verifier approval procedure in C.A.F.E. Practices dictates that all applicants completely and truthfully disclose all pertinent information. Information submitted in verification organization applications will be checked by SCS for accuracy and consistency. All verification organizations provisionally and fully approved for work in the program are expected to maintain hard copies of documents related to their work for C.A.F.E. Practices in a safe and secure place to protect the confidentiality of the clients. Verifiers should also provide all relevant personnel with both electronic and hard copies of the Verifier Operations Manual, Generic Evaluation Guidelines, and Scorecards, along with sufficient copies of entity-specific official Field Notes templates to complete verification assignments. In addition, all personnel records, training materials, and contact information should be updated on a recurring basis by the verification organization. SCS will update the Verifier List hosted on SCS's website at http://www.scscertified.com/csrpurchasing/starbucks_approvedverifiers.html on an as needed basis based on updated information supplied by verification organizations to SCS.

4.1 Truthful Disclosure

The application process requires that the applicant verification organizations provide full disclosure of the applicant's credentials and competency to carry out independent, technical verification audits of entities (including producers, processors and producer support organizations) participating in C.A.F.E. Practices. The applicant verification organization must fully and accurately describe its:

- legal and financial structure;
- organizational structure and the technical qualifications of its key employees and contractors;
- prior experience in conducting audits within the coffee sector or other third-party auditing experience;
- potential conflicts of interest that would call into question the ability to operate as an independent verification entity;
- internal review and training procedures;
- dispute resolution policy.

4.2 Document Control

Verifiers must maintain up-to-date hard-copy records of all personnel records and of all records pertaining to verification work conducted, including field notes, client report approval forms, and client contracts for a minimum of 3 years. SCS reserves the right to review this documentation during annual accreditation audits and at any other point deemed necessary. In all other cases, verification organizations should provide documents within five business days from the date of the request. Verifiers should maintain updated, secure files of all of the following C.A.F.E. Practices documents:

- Personnel records (for all verifiers, formally contracted and sub-contracted inspectors), including confidentiality agreements, CVs, qualifications, C.A.F.E. Practices training, conflict of interest declarations;
- Contracts with C.A.F.E. Practices participants;
- Field notes from verifications;
- Records of internal reviews, disputes, and appeals, Verifier Operations Manual and Verification Organization Approval Procedures;
- Official C.A.F.E. Practices Evaluation Guidelines, Scorecards, Field Notes, and all supporting program documents.

5.0 QUALIFICATION REQUIREMENTS FOR VERIFIERS AND INSPECTORS

SCS has identified four main overlapping qualifications essential for all verification organizations to possess. These include organizational capacity, internal review and training capabilities, and a clearly established dispute resolution process. Explanation of each of these qualifications is required in the Verification Organization Application Form.

5.1 Organizational Capacity

Beginning in 2008, SCS is requiring that all new verification organizations applying for approval status in 2008 must be affiliated and working with established organizations. In certain cases, in which SCS finds a lack of formal third-party auditing organizations in a given country or region, SCS may allow specific individuals possessing the necessary expertise and work experience to apply for verification organization status.

The intention behind this organizational structure or affiliation requirement is to ensure that all verification organizations working in C.A.F.E. Practices have sufficient internal review processes in place through which the quality of submitted reports can be internally assessed and improved if needed on an ongoing basis. Likewise, it is preferred that both inspectors and verifiers serve distinct roles in relation to C.A.F.E. Practices verification procedures. For example, the Verifier Reporting System (VRS) defines these roles based on this separation of responsibilities providing a built-in quality control mechanism for all reporting activities, assuming that no one person is acting exclusively as both a verifier and inspector for a given verification organization. All existing fully and provisionally approved verification organizations will be contacted in writing by SCS and be given six months in which to develop either a formal organizational structure, replete with an internal review function assigned to someone other than the inspector, or an affiliation with an established third-party organization or NGO.

As part of the verification organization application process for new organizations, verifiers will need to describe their organizational structure related to their C.A.F.E. Practices activities, e.g., head office, responsible party for quality control, number of participating satellite offices, employees, subcontractors. Verifiers must ensure that subcontracted inspectors adhere to the policies and procedures detailed in the Verifier and Inspector Manual and this approval procedure document.

5.2 Internal Review

Verification organizations are responsible for developing adequate internal controls and review procedures to ensure their verifier(s) and inspectors adhere to the verification procedures and policies detailed in the Verifier Operations Manual. The VRS allows verifiers to review reports submitted by their inspectors, posting comments, and when necessary, to request that their inspectors review their evaluations. SCS expects that all verification will utilize an internal review function to ensure the quality of reports submitted to Starbucks in the VRS.

5.3 Internal Training

Each verification organization is responsible for providing sufficient training to inspectors on C.A.F.E. Practices and evidence of such training should be made available to SCS upon request. This should be done prior to the inspector(s) commencing work in the program if they have not received a SCS administered C.A.F.E. Practices training.

Verifiers working for verification organizations are also charged with ensuring that all communications issued by SCS or Starbucks are distributed appropriately to all personnel working as inspectors carrying out C.A.F.E. Practices verifications. These communications include, but are not limited to, Verifier Guidance Updates, information on interpretation of indicators, updates or changes to regionally-specific verification periods, and deadlines for completing fieldwork and submitting reports.

5.4 Personnel Records

SCS requests that verification organizations supply an annually updated roster of all formally employed and subcontracted inspectors, accompanied by updated Curriculum Vitas (CVs) including C.A.F.E. Practices internal or SCS training they have received. Hard copies of these records should be maintained by verification organizations and made available for SCS review in the course of yearly accreditation audits.

5.5 Dispute Resolution

Verification organizations shall have written procedures (including identified personnel) and a designated reviewer or review committee for the resolution of complaints, appeals, and disputes between C.A.F.E. Practices supplier participants/applicants or other parties and the verification organization. The verifier shall make available information about the procedures for submitting complaints, appeals, and disputes. Approved verifiers are required to keep a record of all appeals, complaints, disputes, and remedial actions relative to C.A.F.E. Practices, which will be inspected annually during yearly accreditation audits.

In accordance with Section 7.6.2.3 of the Verifier and Inspector Operations Manual disputes are to be classified as both informal and formal, depending on whether they can be resolved internally between the verification organization and the client or whether they require third-party review and remediation on the part of SCS or Starbucks Coffee Company. In these cases when a dispute occurs between a verification organization and SCS, the C.A.F.E. Practices oversight committee at the Starbucks Coffee Company will review these cases.

6.0 CONFIDENTIALITY

SCS treats all information received from verification organizations, C.A.F.E. Practices participants, and all other parties involved in the C.A.F.E. Practices program as confidential. This protects the confidentiality of all information pertaining to verification reporting and status

in the C.A.F.E. Practices program. At no time will SCS intentionally disclose information to outside parties regarding verification reports, a supplier's validity status in the program, or the performance of verification organizations in the program unless first authorized to do so by Starbucks and all other interested parties.

Verifiers are also required to operate under strict confidentiality agreements with their clients provided however the verification reports and results are shared with Starbucks and SCS. Contracts with clients seeking verification services should include a clause explaining the contracted verification organization's policy on confidentiality, and all personnel conducting C.A.F.E. Practices verifications should sign stand-alone confidentiality and non-disclosure agreements. Evidence of these documents will be requested during verification organizations' annual accreditation audits performed by SCS.



A.1 C.A.F.E. Practices Verification Organization Application Form

Please fill out this form completely and e-mail to:

CSR Purchasing and Supply Chain Programs
Scientific Certification Systems
 2200 Powell St. Suite 725
 Emeryville, CA 94608
 Email: cafepactices@scscertified.com
 Web: <http://www.scscertified.com>

Questions?
 Email: cafepactices@scscertified.com
 Main: 1.510.452.8000
 Fax : 1.510.452.8001

CONTACT INFORMATION

Verification organization Name:	
Contact Person:	
Address:	
Phone:	
Fax:	
Email:	
Website:	

DESCRIPTION OF VERIFICATION ORGANIZATION

<p><u>Financial and Legal Structure:</u> Include a brief description of the legal status of the verification organization (e.g., a for profit enterprise, a not-for-profit entity, etc.), including the names of its owners and, if different, names of the persons who control it.</p>	
<p><u>Management Structure:</u> Describe the management structure of your organization (e.g., head office, responsible party for quality control, number of participating satellite</p>	

offices, employees, sub-contractors).	
<u>Responsible Parties:</u> List the names, titles, and responsibilities of personnel directly who will be directly involved in C.A.F.E. Practices verification work. Attach organizational chart and CV's.	
<u>Services Offered:</u> List the services offered/performed by the organization.	
<u>Geographic Operation:</u> List the geographic countries of operation.	
<u>Language:</u> What languages do staff working for the organization speak and write? Please include name of each employee and their level of proficiency in each spoken and written language. (1-Poor, 5- Excellent)	
<u>Technical Capacity:</u> Describe the organization's access to technical and logistical tools that facilitate field verification work and reporting activities (i.e. telecommunications, computer and internet capabilities, reliable transportation, GPS units, digital cameras, etc.).	
<u>Additional Information:</u>	

QUALIFICATIONS

<u>General Policies for C.A.F.E. Practices Verification:</u> Describe, or provide in separate document general	
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<p>policies and procedures for conducting C.A.F.E. Practices verification work (including document control).</p>	
<p><u>Accreditations of Applicant:</u> List any accreditations applicant has obtained or is presently seeking.</p>	
<p><u>Experience:</u> How many years of verification experience/operation does the applicant verification organization have?</p>	
<p><u>Certification Work:</u> Describe other relevant certification/verification work: a) in general; b) in the coffee sector.</p>	
<p><u>Past Verification Work:</u> Describe any prior verification work for Starbucks C.A.F.E. Practices, the Starbucks Preferred Supplier Program (PSP) or other Starbucks programs.</p>	
<p><u>Training of Auditors:</u> List any relevant workshops or training programs (i.e. those that pertain to environmental and social auditing methods and procedures) attended by auditors/inspectors employed or contracted by the applicant.</p>	

VERIFIER INDEPENDENCE AND CONFIDENTIALITY

<p><u>Independency Policy:</u> Describe policies that ensure Verification organization, verifiers, and inspectors remain free from any commercial, financial</p>	
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<p>and other pressures that might influence the results of a verification process.</p>	
<p><u>Confidentiality Policy:</u> Describe verification organization's policies and procedures that ensure the confidentiality of the information obtained in the course of verification is safeguarded.</p>	
<p><u>Conflict of interest:</u> Verification organizations, verifiers, and their inspectors must not be presently associated with, or have worked directly for, the entities they are verifying without disclosing and describing the nature of such affiliations to SCS to avoid any potential for a conflict of interest.</p> <p>a) List all entities within the coffee growing and processing sector with which the applicant has, now or in the past 2 years, a financial and/or contractual relationship.</p> <p>b) As well, list any other circumstances that could call into question the independence of the applicant. If subcontractors will be used- describe how confidentiality and conflict of interest shall be prevented.</p>	
<p><u>Additional Information:</u></p>	

INTERNAL REVIEW AND TRAINING

<p><u>Internal Review:</u> Describe the procedures for internal review of C.A.F.E. Practices reports including the responsible party(ies) for</p>	
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final review, peer review practices, etc.	
Internal Training: Describe the training procedures in place for new and existing employees, including the intended frequency of C.A.F.E. Practices internal trainings.	

DISPUTE RESOLUTION

Policy and procedure: Describe verification organizations' policies and procedures (including identified personnel) for the resolution of complaints, appeals, and disputes between C.A.F.E. Practices participants/applicants or other parties and the verification organization.	
Additional Information:	

SCS APPLICATION REVIEW- DO NOT COMPLETE. FOR OFFICE USE ONLY.

Date Received:	
Date Reviewed:	
Reviewer Name(s):	
Approval Granted?	
Date:	
Reviewer Notes:	
Applicant Notified On:	