

FLA Audit Profile	
Country	Tunisia
Factory name	08007557D
IEM	Tunisia Team of the Fair Wear Foundation
Date(s) in facility	December 15, 2005
PC(s)	Nordstrom
Number of workers	329
Product(s)	Apparel
Production processes	Sewing, Knitting, Packaging

FLA Code/Compliance Issue	Country Law/Legal Reference	FLA Benchmark	Noncompliance	Risk of Noncompliance
1. Code Awareness				
Code posting/information		FLA Principle of Monitoring, Obligation of Companies: Establish and articulate clear, written workplace standards. Formally convey those standards to Company factories as well as to licensees, contractors and suppliers.	Nordstrom Code of Conduct (COC) not posted in factory. There has not been any code training provided by Nordstrom to factory management.	

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Worker/management awareness of Code		<p>FLA Principle of Monitoring, Obligation of Companies: Ensure that all Company factories as well as contractors and suppliers inform their employees about the workplace standards orally and through the posting of standards in a prominent place (in the local languages spoken by employees and managers) and undertake other efforts to educate employees about the standards on a regular basis.</p>	Management and workers are not aware of Nordstrom or FLA Codes of Conduct.	
Confidential Noncompliance reporting channel		<p>FLA Principle of Monitoring, Obligation of Companies: Develop a secure communications channel, in a manner appropriate to the culture and situation, to enable Company employees and employees of contractors and suppliers to report to the Company on noncompliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.</p>	There is no confidential reporting channel within the factory.	
2. Forced Labor				
There will not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.				

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Employment Records		Employers will maintain sufficient hiring and employment records to demonstrate and verify compliance with this Code provision	1) Not all contracts were signed by employees. 2) 2 contracts were missing for new personnel. 3) Some personnel files are not well maintained where copies of identity cards or birth certificates are missing. 4) Submission of information to Social Security is not done on the required time.	
3. Child Labor				
No person will be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.				
4. Harassment or Abuse				
Every employee will be treated with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment of abuse.				
Progressive Discipline		Employers will utilize progressive discipline, e.g., escalating discipline using steps such as verbal warning, written warning, suspension, termination. Any exceptions to this rule, e.g., immediate termination for theft or assault, shall be in writing and clearly communicated to workers.	The procedures of disciplinary actions are neither written nor clearly communicated to workers.	
Record Maintenance		Employers will maintain written records of disciplinary actions taken.	There are no records of disciplinary measures in place.	
5. Nondiscrimination				

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No person will be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin.				
6. Health and Safety				
Employers will provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities.				
PPE		Workers shall wear appropriate protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to hazardous elements including medical waste.	Management does not enforce the use of PPE. Equipment is made available however workers do not consistently use it.	Workers in pressing areas are working with antiquated equipment and run the risk of becoming injured.
Chemical Management		All chemicals and hazardous substances should be properly labeled and stored in accordance with applicable laws. Workers should receive training, appropriate to their job responsibilities, in the safe use of chemicals and other hazardous substances.	MSDS are missing. Chemicals and inflammable materials are not stored properly in the mechanics workshop.	
Ventilation/Electrical/facility maintenance		All ventilation, plumbing, electrical, and lighting services shall be provided and maintained to conform to applicable laws and prevent hazardous conditions to employees in the facility.	Factory does not have an adequate ventilation system in place that would reduce heat during summer months. Light levels are low. Illumination study is recommended to determine if lighting is adequate.	

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Record Maintenance		All safety and accident reports shall be maintained for at least 1 year, or longer if required by law.	Medical records are not maintained adequately.	
Machinery Maintenance		All production machinery and equipment shall be maintained, properly guarded, and operated in a safe manner.	Machines are missing safety equipment. Lock out equipment is missing	
Sanitation in Facilities		All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with applicable laws.	There is insufficient number of bathroom stalls relative to number of workers.	
Sanitation in Dining Area		All food preparation shall be prepared, stored, and served in a sanitary manner in accordance with applicable laws. Safe drinking water should be available in each building.		There is no refrigeration system in canteen for the workers, most of whom bring food from home.
Other			General physical condition of factory requires attention: windows are broken, housekeeping lacks maintenance.	
7. Freedom of Association and Collective Bargaining				
Employers will recognize and respect the right of employees to freedom of association and collective bargaining				

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Right to Freely Associate		Workers will have the right to establish and, subject only to the rules of the organization concerned, to join organizations of their own choosing without previous authorization. The right to freedom of association begins at the time that a worker seeks employment, and continues through the course of employment.		There is no written policy that acknowledges the rights for worker representation.
Compliance to local collective bargaining laws	Tunisian Labor Code, Section 157 and subsequent sections.	Employers will comply with all national and local laws and regulations concerning collective bargaining and free association. Where conflicts are known to exist, employers will use the standard that provides the greatest protection for workers.		

FLA Code/Compliance Issue	Country Law/Legal Reference	FLA Benchmark	Noncompliance	Risk of Noncompliance
Employer Interference/Elections	Tunisian Labor Code, Section 157 and subsequent sections.	Workers' organizations have the right to elect their representatives and conduct their activities without employer interference.		
Other	Tunisian Labor Code, Section 157 and subsequent sections.			
8. Wages and Benefits				

FLA Code/Compliance Issue	Country Law/Legal Reference	FLA Benchmark	Noncompliance	Risk of Noncompliance
Employers recognize that wages are essential to meeting employees' basic needs. Employers will pay employees, as a base, at least the minimum wage required by local law or the prevailing industry wage, whichever is higher, and will provide legally mandated benefits				
Wage and Benefits Posting	Law of December 11, 1957 related to Labor Accidents in the Tunisian Labor Code	All notices that are legally required to be posted in the factory work areas will be posted. All legally required documents, such as copies of legal code or law, will be kept at the factory and available for inspection.	Factory does not post labor codes or health and safety regulations on factory walls.	
Wage and Benefits Information Access		In general, workers will have access to understandable information about their wages and benefits, and will not express dissatisfaction with their ability to get information.		
Time-recording system	Tunisian Labor Code Section 90 and subsequent Sections	Time worked by all employees, regardless of compensation system, will be documented by time cards or other accurate and reliable recording systems such as electronic swipe cards.		Electronic time recorder does not record any hours worked over regular working hours. Overtime hours are not recorded.
Accurate recording of wage compensation		All hourly wages, piecework, bonuses, and other incentives will be calculated and recorded accurately.		The time recorder does not take into account the exit time
Timely Payment		All compensation shall be paid in a timely manner.		

FLA Code/Compliance Issue	Country Law/Legal Reference	FLA Benchmark	Noncompliance	Risk of Noncompliance
Record Maintenance		All legally required payroll documents, journals and reports will be available complete, accurate and up-to-date. (In the United States terms this would include W-4s, I-9s, green cards, 941s and supporting material.	During low periods, workers are sent home and are not paid. Management must sign an agreement with the Consultative Committee that acknowledges these low periods. No records were located.	
9. Hours of Work				
		Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country will not limit the hours of work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least one day off in every seven day period.		
Reduce Mandated OT		The employer will demonstrate a commitment to reduce mandated overtime and to enact a voluntary overtime system to meet unforeseen situations.		
10. Overtime Compensation				
		In addition to their compensation for regular hours of work, employees will be compensated for overtime hours at such premium rate as is legally required in the country of manufacture or, in those countries where such laws will not exist, at a rate at least equal to their regular hourly compensation rate.		

FLA Code/Compliance Issue	Country Law/Legal Reference	FLA Benchmark	Noncompliance	Risk of Noncompliance
Accurate recording of OT hours worked?		Employees will be paid for all hours worked in a workweek. Calculation of hours worked must include all time that the employer allows or requires the worker to work.		Time recorder does not accurately record the time workers leave the factory.
Miscellaneous				

IEM Findings					
Evidence of Noncompliance (Uncorroborated)	If Not Corroborated, Explain Why	Sources/ Documentation Used for Corroborating	Notable Features Implemented by Factory Management or Company	PC Internal Audit Findings (Optional)	PC Remediation Plan
		Visual Inspection and management interview.			Nordstrom's policy is to provide poster once factory completed all issues and is approved from social compliance. However, COC communicated to factory through our partnership guidelines. Factory required to sign our guidelines on an annual basis. Once factory approved, Nordstrom will send COC poster to be posted for worker review. This poster will state Nordstrom's requirements and be written in the workers' native language. Factory to ensure workers educated about these standards on regular basis.

Evidence of Noncompliance (Uncorroborated)	If Not Corroborated, Explain Why	Sources/ Documentation Used for Corroborating	Notable Features Implemented by Factory Management or Company	PC Internal Audit Findings (Optional)	PC Remediation Plan
		Worker and Management Interviews			Factory advised to train management and employees on Nordstrom and FLA Codes of Conduct.
		Worker and Management Interviews			Nordstrom completed research project to determine best option for a noncompliance reporting tool for factory workers. At this time we are evaluating these options to implement going forward. For some factories in China, a toll-free number has been established for this purpose. Currently we are evaluating its effectiveness. Factory advised to install a suggestion box and to train workers on the purpose and how to use it. Factory advised to document and respond to any suggestions found.

Evidence of Noncompliance (Uncorroborated)	If Not Corroborated, Explain Why	Sources/ Documentation Used for Corroborating	Notable Features Implemented by Factory Management or Company	PC Internal Audit Findings (Optional)	PC Remediation Plan
		Records Review			Factory advised to maintain all contracts and files. Factory advised to train the responsible employees on the importance of maintaining files and to ensure it's done properly. Factory advised to submit all social security records as required by law.
		Records review and worker interviews.			
		Records Review			Factory advised to maintain all disciplinary records and to train employees on the factory's policy for documentation.

Evidence of Noncompliance (Uncorroborated)	If Not Corroborated, Explain Why	Sources/ Documentation Used for Corroborating	Notable Features Implemented by Factory Management or Company	PC Internal Audit Findings (Optional)	PC Remediation Plan
		Visual Inspection and Management Interviews			Factory advised to train all supervisors and employees on importance of wearing personal protective equipment (PPE) and what the risks are for not wearing it. Factory advised to put posters in factory to remind employees of PPE. Factory advised to have someone responsible to walk the factory floor daily and remind anyone not wearing it.
		Visual Inspection			Factory advised to display MSDS in employee's local language and to conduct MSDS training on a regular basis. Factory advised to keep current training documentation. Factory advised to keep the chemicals and inflammable materials labeled and displayed in a organized manner.
		Visual Inspection			Factory advised to maintain ventilation to ensure adequate cooling in summer months and to conduct a study of the lighting in the factory.

Evidence of Noncompliance (Uncorroborated)	If Not Corroborated, Explain Why	Sources/ Documentation Used for Corroborating	Notable Features Implemented by Factory Management or Company	PC Internal Audit Findings (Optional)	PC Remediation Plan
		Visual Inspection and management interviews.			Factory advised to maintain medical records and to train the employees to ensure understanding of how to maintain records.
		Visual Inspection.			Factory advised to train employees who are responsible on how to maintain machines and to ensure safety equipment installed. Factory advised to have someone responsible who will walk factory floor daily to ensure all machines are in proper condition.
		Visual Inspection.			Factory advised to review the factory's plans to install more bathroom stalls.
		Visual Inspection.			Factory advised to have storage for workers who bring food from home.
		Visual Inspection.			Factory advised to maintain standards of health and safety in the factory. Factory advised to train those responsible and to maintain records of issues found in the factory.

Evidence of Noncompliance (Uncorroborated)	If Not Corroborated, Explain Why	Sources/ Documentation Used for Corroborating	Notable Features Implemented by Factory Management or Company	PC Internal Audit Findings (Optional)	PC Remediation Plan
		Management interviews.			Factory advised to create a written policy and to train all workers on the rights for worker representation. Factory advised to add the policy to their new employee orientation.
Records and meetings of consultative committee are not consistent with local requirements.		Worker Interviews			Factory advised to train the worker representative on local requirements.

Evidence of Noncompliance (Uncorroborated)	If Not Corroborated, Explain Why	Sources/ Documentation Used for Corroborating	Notable Features Implemented by Factory Management or Company	PC Internal Audit Findings (Optional)	PC Remediation Plan
Workers are not aware of their rights to elect representatives for the Consultative Committee.		Worker Interviews			Factory advised to train employees on their right to elect a representative.
Workers are not aware of the functions of the Consultative Committee					Factory advised to train employees on the functions of the Consultative Committee.

Evidence of Noncompliance (Uncorroborated)	If Not Corroborated, Explain Why	Sources/ Documentation Used for Corroborating	Notable Features Implemented by Factory Management or Company	PC Internal Audit Findings (Optional)	PC Remediation Plan
		Visual Inspection			Factory advised to post labor codes and health and safety regulations and to ensure that they are updated regularly.
Not all workers are aware of their legal rights regarding wages.		Worker Interviews			Factory advised to train all employees on wages and benefits.
		Visual Inspection, Management Interviews, Paperwork review.			Factory advised to change system to ensure all hours, including overtime is recorded.
		Visual Inspection and worker interviews and records review			Factory advised to change system to ensure all hours, including overtime is recorded.
Worker interviews indicate that payment of wages is not consistent or regular.					Factory advised to train all workers on the pay date and to ensure it's consistent each month.

Evidence of Noncompliance (Uncorroborated)	If Not Corroborated, Explain Why	Sources/ Documentation Used for Corroborating	Notable Features Implemented by Factory Management or Company	PC Internal Audit Findings (Optional)	PC Remediation Plan
		Worker Interviews, recorded review.			Factory advised to sign the agreement with the Consultative Committee to state low production periods and to ensure that employees are informed.
Per worker interviews, overtime is mandatory if workers have not met their quota.					All overtime must be voluntary, factory advised to re-train workers on their policy.

Evidence of Noncompliance (Uncorroborated)	If Not Corroborated, Explain Why	Sources/ Documentation Used for Corroborating	Notable Features Implemented by Factory Management or Company	PC Internal Audit Findings (Optional)	PC Remediation Plan
Worker interviews indicate that workers are not paid the extra time that is worked in order to meet their quotas.		Visual Inspection and worker interviews.			Factory advised to maintain time records properly to show exit times and to pay for all hours worked. Factory advised to train all workers on their policy.

Remediation				[Status]	Updates	
Target Completion Date	Factory Response (Optional)	Company Follow Up (Cite Date of Follow Up)	Documentation	Completed, Pending, Ongoing	Company Follow Up (October 5, 2006)	Documentation
5/1/2006		Nordstrom provided training to management January 6, 2006		Completed	Third Party Reaudit confirmed Code of Conduct posted at entrance of factory where employees swipe their cards.	10/05/2006 Third Party Reaudit.

Target Completion Date	Factory Response (Optional)	Company Follow Up (Cite Date of Follow Up)	Documentation	Completed, Pending, Ongoing	Company Follow Up (October 5, 2006)	Documentation
3/1/2006		Nordstrom provided training to management January 6, 2006		Pending	Third Party Reaudit confirmed COC posted at entrance of factory where employees swipe their cards. Nordstrom in process of confirming dates of training.	10/05/2006 Third Party Reaudit.
3/1/2006, ongoing				Ongoing	Third Party Reaudit confirmed facility implemented written policy that acknowledges the rights of worker representation. All workers vote to select representatives for Consultative Committee. Consultative Committee conducts meetings with workers and factory's representatives. Records of meetings recorded in a logbook. It was verified that workers confidentially reported grievances via their representatives to Consultative Committee. Nordstrom contact information is provided on partnership guidelines poster posted in factory for workers to review.	

Target Completion Date	Factory Response (Optional)	Company Follow Up (Cite Date of Follow Up)	Documentation	Completed, Pending, Ongoing	Company Follow Up (October 5, 2006)	Documentation
3/1/2006				Completed.	1-3) Reaudit confirmed all contracts and personnel files signed and maintained with copies of national identification. 4) Reaudit confirmed all employees registered with Social Security.	10/05/2006 Third Party Reaudit.
				Completed.	Third Party Reaudit confirmed disciplinary procedures clearly communicated to workers. Facility posted disciplinary procedures in employee entrance to ensure each worker can review when they enter and exit facility.	10/05/2006 Third Party Reaudit.
3/1/2006				Completed.	Third Party Reaudit confirmed records of disciplinary measures are in place and recorded in a logbook.	10/05/2006 Third Party Reaudit.

Target Completion Date	Factory Response (Optional)	Company Follow Up (Cite Date of Follow Up)	Documentation	Completed, Pending, Ongoing	Company Follow Up (October 5, 2006)	Documentation
3/1/2006				Complete	Third Party Reaudit confirmed metal mesh gloves provided to cutting employees and warning signs posted throughout work floors mentioning the importance of PPE.	10/05/2006 Third Party Reaudit.
3/1/2006				Complete.	Third Party Reaudit confirmed facility does not use chemicals. All chemicals used in the sister company where dying and washing processes are performed.	10/05/2006 Third Party Reaudit.
4/1/2006				Complete	Third Party Reaudit confirmed facility has an air conditioning system that functions during the summer time. Confirmed by Third Party and Nordstrom representative that have been addressed and factory will continue to monitor.	10/05/2006 Third Party Reaudit.

Target Completion Date	Factory Response (Optional)	Company Follow Up (Cite Date of Follow Up)	Documentation	Completed, Pending, Ongoing	Company Follow Up (October 5, 2006)	Documentation
3/1/2006				Pending	Third Party Reaudit noted medical records are not yet maintained adequately.	10/05/2006 Third Party Reaudit.
3/1/2006				Pending	Third Party Reaudit assessed this is still an issue.	10/05/2006 Third Party Reaudit.
4/1/2006				Complete.	Third Party Reaudit confirmed there are adequate number of toilets relative to number of workers.	10/05/2006 Third Party Reaudit.
4/1/2006				Complete.	Third Party Reaudit confirmed a refrigerator is provided in the canteen.	10/05/2006 Third Party Reaudit.
3/1/2006				Complete.	Third Party Reaudit confirmed general housekeeping is sufficient and all windows are in good condition.	10/05/2006 Third Party Reaudit.

Target Completion Date	Factory Response (Optional)	Company Follow Up (Cite Date of Follow Up)	Documentation	Completed, Pending, Ongoing	Company Follow Up (October 5, 2006)	Documentation
3/1/2006				Completed.	Third Party Reaudit confirmed facility has implemented a written policy that acknowledges the rights of worker representation. The election of worker representatives conducted and all employees voted for selecting employees' representatives. Consultative committee conducts meeting with employees' and employer's representatives and records of meetings are recorded in logbook. Employees reported they are addressing employees' representatives in case they want to state something to management confidentially. The consultative committee discussed details of payment and wages and informed employees regarding it in 2006.	10/05/2006 Third Party Reaudit.
4/1/2006				Completed.	Third Party Reaudit confirmed facility has implemented a written policy that acknowledges the rights of worker representation. The election of worker representatives conducted and all employees voted for selecting employees' representatives. Consultative committee conducts meeting with employees' and employer's representatives and records of meetings are recorded in logbook. Employees reported they are addressing employees' representatives in case they want to state something to management confidentially. The consultative committee discussed details of payment and wages and informed employees regarding it in 2006.	10/05/2006 Third Party Reaudit.

Target Completion Date	Factory Response (Optional)	Company Follow Up (Cite Date of Follow Up)	Documentation	Completed, Pending, Ongoing	Company Follow Up (October 5, 2006)	Documentation
4/1/2006				Completed.	Third Party Reaudit confirmed facility has implemented a written policy that acknowledges the rights of worker representation. The election of worker representatives conducted and all employees voted for selecting employees' representatives. Consultative committee conducts meeting with employees' and employer's representatives and records of meetings are recorded in logbook. Employees reported they are addressing employees' representatives in case they want to state something to management confidentially. The consultative committee discussed details of payment and wages and informed employees regarding it in 2006.	10/05/2006 Third Party Reaudit.
4/1/2006				Completed.	Third Party Reaudit confirmed facility has implemented a written policy that acknowledges the rights of worker representation. The election of worker representatives conducted and all employees voted for selecting employees' representatives. Consultative committee conducts meeting with employees' and employer's representatives and records of meetings are recorded in logbook. Employees reported they are addressing employees' representatives in case they want to state something to management confidentially. The consultative committee discussed details of payment and wages and informed employees regarding it in 2006.	10/05/2006 Third Party Reaudit.

Target Completion Date	Factory Response (Optional)	Company Follow Up (Cite Date of Follow Up)	Documentation	Completed, Pending, Ongoing	Company Follow Up (October 5, 2006)	Documentation
4/1/2006				Complete	Third Party Reaudit confirmed Health and Safety regulations are posted in the factory entrance.	10/05/2006 Third Party Reaudit.
4/1/2006				Complete	Third Party Reaudit confirmed the consultative committee informed the employees of the details of payment and wages.	10/05/2006 Third Party Reaudit.
3/1/2006, immediately				Complete	Third Party Reaudit reported employees are using swipe cards to record their daily working hours. Time records indicate daily entrance and exit times of the employees at this time. Moreover, overtime hours are also listed on time records and all employees reported swiping their cards after overtime work.	10/05/2006 Third Party Reaudit.
3/1/2006, immediately				Complete	Third Party Reaudit reported employees are using swipe cards to record their daily working hours. Time records indicate daily entrance and exit times of the employees at this time. Moreover, overtime hours are also listed on time records and all employees reported swiping their cards after overtime work.	10/05/2006 Third Party Reaudit.
4/1/2006				Pending	Third Party Reaudit reported dates of payment are not consistent.	

Target Completion Date	Factory Response (Optional)	Company Follow Up (Cite Date of Follow Up)	Documentation	Completed, Pending, Ongoing	Company Follow Up (October 5, 2006)	Documentation
4/1/2006				Pending	Nordstrom continues to follow up with the factory to educate workers and post schedule in the factory.	
4/1/2006				Complete	Third Party Reaudit assessed through worker interviews that overtime is not mandatory. Moreover, facility posted notice on work floors mentioning that all overtime hours are to be conducted voluntarily. All employees reported they are free to decline the overtime work after regular working hours even if they do not finish their daily quota.	

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4/1/2006				Complete.	Third Party Reaudit reported employees are using swipe cards to record their daily working hours. Time records indicate daily entrance and exit times of the employees. Moreover, overtime hours are also listed on time records and all employees reported swiping their cards after overtime work.	

Third-Party Verification		Company Verification Follow Up	
External Verification (Date)	Documentation	Company Follow Up (Cite Date of Planned or Follow-up Visit, if Appropriate)	Documentation

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