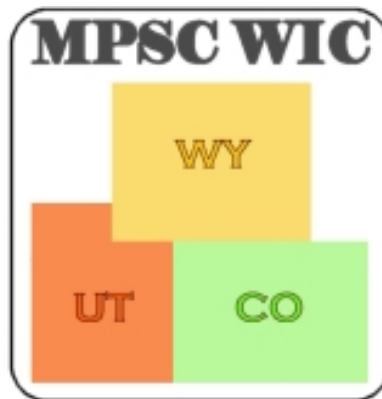


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# Mountain Plains States Consortium WIC System Project

## DETAILED FUNCTIONAL DESIGN DOCUMENT SA 5 SYSTEM ADMINISTRATION VENDOR MANAGEMENT SCREENS

*Presented to:*



Revision Date: January 7, 2011

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## Document Revisions

Revision Date	Updated By	Requested By	Description of Revision

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# 1 Vendor Violations

This screen allows for the viewing of mandatory vendor violations, as well as the maintaining of state-defined violations, which are used in various sections of vendor management.

Mandatory and state violations are mutually exclusive. Mandatory violations are pre-installed USDA violations which cannot be changed. Sanction points are not assigned to mandatory violations. State-defined violations are maintained on this screen, which includes the assigning of sanction points for each violation. As sanction points are assessed to a vendor, they are accumulated. When the sanction points threshold (value stored in a system parameter) has been reached for a vendor, a message is displayed on the Date Alerts screen.

> *Vendor Management Administration > Violations*

Vendor Violations					
	Code	Violation Type	Violation Category	Sanction Points	Deactivate
>	A	Alcohol/Tobacco	Mandatory		<input type="checkbox"/>
	C	Credit or non food exchange	Mandatory		<input type="checkbox"/>
	S1	State Violation	State	10	<input type="checkbox"/>

Control	Description	
Add Row	Clicking the Add Row command button creates a new row in the data grid allowing the user to add another vendor violation.	
	<b>Type</b>	Command Button
	<b>Hot Key</b>	Alt + A
Vendor Violations	The data grid used to maintain mandatory and state vendor violations.	
	<b>Type</b>	Data Grid

Control	Description				
Code	The code for the violation type. Must be unique.				
	<b>Type</b>	Text Box			
	<b>Required</b>	Yes			
	<b>Length</b>	4			
	<b>Validation</b>	NA			
	<b>Display Only</b>	Yes, if Violation Category = Mandatory	<b>Calculated</b>	No	
	<b>DB Column</b>	VendorViolationType.ViolationTypeCd			
Violation Type	The description of the violation.				
	<b>Type</b>	Text Box			
	<b>Required</b>	Yes			
	<b>Length</b>	50			
	<b>Validation</b>	NA			
	<b>Display Only</b>	Yes, if Violation Category = Mandatory	<b>Calculated</b>	No	
	<b>DB Column</b>	VendorViolationType.Name			
Violation Category	Indicates whether or not the violation is a mandatory or state defined violation. Defaults to "State" when new row is added.				
	<b>Type</b>	Text Box			
	<b>Required</b>	NA			
	<b>Length</b>	NA			
	<b>Validation</b>	NA			
	<b>Display Only</b>	Yes	<b>Calculated</b>	No	
	<b>DB Column</b>	VendorViolationType.ViolationType			

Control	Description			
Sanction Points	The points assigned to the specific state violation.			
	<b>Type</b>	Text Box		
	<b>Required</b>	Yes, if Violation Category = State		
	<b>Length</b>	2		
	<b>Validation</b>	Numeric		
	<b>Display Only</b>	Yes, if Violation Category = Mandatory	<b>Calculated</b>	No
	<b>DB Column</b>	VendorViolationType.SanctionPts		
Deactivate	Indicates whether or not the violation is still active within the application. When the deactivate checkbox is checked, the violation no longer appears in the drop-down list boxes within Vendor Management; but, the historical references to the violations that have been deactivated are maintained.			
	<b>Type</b>	Check Box		
	<b>Display Only</b>	No	<b>Calculated</b>	No
	<b>DB Column</b>	VendorViolationType.Status		
<Last Modified By User and Date>	In the lower right-hand corner, the user and the date of the last update of the violation type record are displayed.			
	<b>Type</b>	Text Box		
	<b>Required</b>	No		
	<b>Length</b>	NA		
	<b>Validation</b>	Mask of 'firstname lastname mm/dd/yyyy'		
	<b>Display Only</b>	Yes	<b>Calculated</b>	No
	<b>DB Column</b>	VendorViolationType.ModifyStfpID VendorViolationType.ModifyDt		

### Business Rules

- Violations are only available for use in vendor records when they are active.
- Mandatory violations do not have sanction points.
- Violation Codes must be unique. Display error.
- Mandatory violations cannot be modified; however, they can be deactivated.
- Data will be sorted by Violation Category then Violation Type.
- When a row is being added, only State violations can be created.

**Developer Notes**

1. Deployment note: The following records should be created as they follow the USDA standard for TIP.

- Trafficking (T)

- Alcohol/Tobacco (A)

- Reimbursement in Excess of Inventory (I)

- Overcharging (O)

- FI outside authorized channels (R)

- Charging for Supplemental Foods (F)

- Credit or non food Exchange (C)

- Unauthorized Food Exchange (U)

- Food Stamp Reciprocal Action (FSP)

- No Sanction – Warning Letter (W)

- State Agency Sanction (S)

## 2 Peer Groups – Min and Max Values

This screen allows for the setup of vendor peer groups by range type and structure max and min values. These values are used in the automated calculation of peer groups in vendor management.

> *Vendor Management Administration* > *Peer Groups – Min and Max Values*

Peer Group Min and Max							
	Peer Group Type	Range Type	Structure	Min Value	Max Value	Peer Group	Deactivate
>	Grocery	Food Stamp Elig Sales	Corporation	0	19,000	1	<input type="checkbox"/>
	Grocery	Food Stamp Elig Sales	Partnership	0	4,999	1	<input type="checkbox"/>
	Grocery	Food Stamp Elig Sales	Partnership	5,000	30,000	2	<input type="checkbox"/>
	Grocery	Registers	Sole Proprietor	0	2	1	<input type="checkbox"/>
	Grocery	Registers	Partnership	0	3	1	<input type="checkbox"/>
	Grocery	Registers	Corporation	0	6	1	<input type="checkbox"/>

Control	Description	
Add Row	Clicking the Add Row command button opens up a blank row in the Peer Group Min and Max grid for a new value to be entered.	
	<b>Type</b>	Command Button
	<b>Hot Key</b>	Alt + A
Peer Group Min and Max	The data grid used to define the minimum and maximum allowable values for different ranges and store structures.	
	<b>Type</b>	Data Grid
	<b>Display</b>	No
Peer Group Type	The Peer Group Type specifies the peer group type being given a value.	
	<b>Type</b>	List Box
	<b>Required</b>	Yes
	<b>DB Column</b>	VendorPeerGroupCalcRange.PGStoreType
	<b>Code ID</b>	Peer Group Store Type This code element is non-editable. The installed values are: Grocery Special Unknown

Control	Description			
Range Type	The range type specifies the item that is being given a value. These are items such as the number of registers, the square footage of the store, etc.			
	<b>Type</b>	List Box		
	<b>Required</b>	Yes		
	<b>DB Column</b>	VendorPeerGroupCalcRange.RangeTypeCd		
	<b>Code ID</b>	Peer Group Range This code element is non-editable. The installed values are: Food Stamp Elig Sales Registers Square Footage		
Structure	The store structure specifies the ownership type of store that is being given a value.			
	<b>Type</b>	List Box		
	<b>Required</b>	Yes		
	<b>DB Column</b>	VendorPeerGroupCalcRange.StoreStructureCd		
	<b>Code ID</b>	Store Structure This code element is non-editable. The installed values are: Corporation Partnership Sole Proprietor Unknown		
Min Value	This is the minimum value for this range and structure for the specified peer group.			
	<b>Type</b>	Text Box		
	<b>Required</b>	Yes		
	<b>Length</b>	9		
	<b>Validation</b>	Numeric		
	<b>Display Only</b>	No	<b>Calculated</b>	No
	<b>DB Column</b>	VendorPeerGroupCalcRange.MinValue		

Control	Description			
Max Value	This is the maximum value for this range and structure for the specified peer group.			
	<b>Type</b>	Text Box		
	<b>Required</b>	Yes		
	<b>Length</b>	9		
	<b>Validation</b>	Numeric		
	<b>Display Only</b>	No	<b>Calculated</b>	No
	<b>DB Column</b>	VendorPeerGroupCalcRange.MaxValue		
Peer Group	The peer group assigned to this minimum and maximum value.			
	<b>Type</b>	List Box		
	<b>Required</b>	Yes		
	<b>Length</b>	2		
	<b>Validation</b>	Numeric		
	<b>Display Only</b>	No	<b>Calculated</b>	No
	<b>DB Column</b>	VendorPeerGroupCalcRange.PG_ID		
	<b>Code ID</b>	Peer Group table lookup		
Deactivate	Indicates the peer group value is or is not active.			
	<b>Type</b>	Check Box		
	<b>Display Only</b>	No	<b>Calculated</b>	No
	<b>DB Column</b>	VendorPeerGroupCalcRange.Status		
<Last Modified By User and Date>	In the lower right-hand corner, the user and the date of the last update of the record are displayed.			
	<b>Type</b>	Text Box		
	<b>Required</b>	No		
	<b>Length</b>	NA		
	<b>Validation</b>	Mask of 'firstname lastname mm/dd/yyyy'		
	<b>Display Only</b>	Yes	<b>Calculated</b>	No
	<b>DB Column</b>	VendorPeerGroupCalcRange.ModifyStfpID + VendorPeerGroupCalcRange.ModifyDt		

<b>Business Rules</b>																																									
<p>1. Only active peer group values can be used in the peer group calculations of vendor management.</p> <p>2. There cannot be any gaps or overlapping ranges within the same range type, structure and peer group type. Display Warning.</p> <p>For example:</p> <table border="0"> <tr> <td>Grocery</td> <td>Square Footage</td> <td>Corporation</td> <td>0</td> <td>12,000</td> <td>1</td> </tr> <tr> <td>Grocery</td> <td>Square Footage</td> <td>Corporation</td> <td>13,000</td> <td>14,000</td> <td>2</td> </tr> <tr> <td>Grocery</td> <td>Square Footage</td> <td>Corporation</td> <td>13,500</td> <td>14,500</td> <td>3</td> </tr> </table> <p>Overlapping Warning - in the example, the range 13,500 - 14,000 is in Peer Group 2 and 3.</p> <p>Gap Warning - in the example, the range 12,001-12,999 has not been assigned to a Peer Group.</p> <p>3. There can only be one record (row) per peer group within the same Range Type, structure and peer group type. Display Warning.</p> <p>For example:</p> <table border="0"> <tr> <td>Special</td> <td>Square Footage</td> <td>Partnership</td> <td>0</td> <td>12,000</td> <td>1</td> </tr> <tr> <td>Special</td> <td>Square Footage</td> <td>Partnership</td> <td>12,001</td> <td>16,000</td> <td>2</td> </tr> <tr> <td>Special</td> <td>Square Footage</td> <td>Partnership</td> <td>16,001</td> <td>17,000</td> <td>2</td> </tr> </table> <p>In the example, Peer Group 2 is assigned twice.</p> <p>5. The sort order of the grid is as follows:</p> <p>Peer Group Type                      Range Type                      Store Structure                      Min Value                      Max Value</p>						Grocery	Square Footage	Corporation	0	12,000	1	Grocery	Square Footage	Corporation	13,000	14,000	2	Grocery	Square Footage	Corporation	13,500	14,500	3	Special	Square Footage	Partnership	0	12,000	1	Special	Square Footage	Partnership	12,001	16,000	2	Special	Square Footage	Partnership	16,001	17,000	2
Grocery	Square Footage	Corporation	0	12,000	1																																				
Grocery	Square Footage	Corporation	13,000	14,000	2																																				
Grocery	Square Footage	Corporation	13,500	14,500	3																																				
Special	Square Footage	Partnership	0	12,000	1																																				
Special	Square Footage	Partnership	12,001	16,000	2																																				
Special	Square Footage	Partnership	16,001	17,000	2																																				

<b>Developer Notes</b>
1.

### 3 Peer Group – Weighting Factors

This screen allows for the setup of vendor peer weighting factors based on criteria such as geography and sales. These values are used in the automated calculation of peer groups in vendor management. The grids contain pre-populated database records that are determined based on combinations of non-editable list values.

> *Vendor Management Administration > Peer Groups – Weighting Factors*

Peer Group Geography Indicator				
	Geography	Value	Peer Group	Deactivate
>	Geography Indicator	Remote Rural	1	<input type="checkbox"/>
	Geography Indicator	Rural	2	<input type="checkbox"/>
	Geography Indicator	Slightly Urban	3	<input type="checkbox"/>
	Special Geography Indicator	Rural	7	<input type="checkbox"/>
	Special Geography Indicator	Urban	8	<input type="checkbox"/>
	Special Geography Indicator	Metro Market Edge	9	<input type="checkbox"/>

Peer Group Weighted				
	Geography	Type	Value	Deactivate
>	Geographic Indicator	Square Footage	15%	<input type="checkbox"/>
	Geographic Indicator	Geographic Indicator	5%	<input type="checkbox"/>
	Geographic Indicator	Food Stamp Elig Sales	40%	<input type="checkbox"/>
	Geographic Indicator	Registers	40%	<input type="checkbox"/>
	Special Geography Indicator	Geographic Indicator	15%	<input type="checkbox"/>
	Special Geography Indicator	Square Footage	40%	<input type="checkbox"/>
	Special Geography Indicator	Registers	45%	<input type="checkbox"/>

Control	Description	
Peer Group Geography Indicator	The geography indicators and the resultant peer group assignment.	
	<b>Type</b>	Data Grid
	<b>Display</b>	No

Control	Description			
Geography	The type of geography indicator being assigned to a peer group.			
	<b>Type</b>	Text Box		
	<b>Required</b>	Yes		
	<b>Length</b>	NA		
	<b>Validation</b>	NA		
	<b>Display Only</b>	Yes	<b>Calculated</b>	No
	<b>DB Column</b>	VendorPeerGroupGeography.GeographyTypeCd		
	<b>Code ID</b>	Peer Group Geography Type This code element is non-editable. The installed values are: Geography Indicator Special Geography Indicator		
Value	The value assigned to the selected geography indicator.			
	<b>Type</b>	Text Box		
	<b>Required</b>	Yes		
	<b>Length</b>	NA		
	<b>Validation</b>	NA		
	<b>Display Only</b>	Yes	<b>Calculated</b>	No
	<b>DB Column</b>	VendorPeerGroupGeography.CalcValueCd		
	<b>Code ID</b>	Geo Indicator This code element is non-editable. The installed values are: Remote Rural Rural Slightly Urban Urban Metro Market Edge Metro Market Center		
Peer Group	The peer group assigned to the geography indicator.			
	<b>Type</b>	List Box		
	<b>Required</b>	Yes		
	<b>Length</b>	2		
	<b>Validation</b>	Numeric		
	<b>Display Only</b>	No	<b>Calculated</b>	No
	<b>DB Column</b>	VendorPeerGroupGeography.PG_ID		
	<b>Code ID</b>	Peer Group table lookup		

Control	Description			
Deactivate	Indicates the peer group geography indicator is or is not active.			
	<b>Type</b>	Check Box		
	<b>Display Only</b>	No	<b>Calculated</b>	No
	<b>DB Column</b>	VendorPeerGroupGeography.Status		
Peer Group Weighted	The weighting factors and the resultant peer group assignment.			
	<b>Type</b>	Data Grid		
	<b>Display</b>	No		
Geography	The type of geography indicator being assigned to a peer group.			
	<b>Type</b>	Text Box		
	<b>Required</b>	Yes		
	<b>Length</b>	NA		
	<b>Validation</b>	NA		
	<b>Display Only</b>	Yes	<b>Calculated</b>	No
	<b>DB Column</b>	VendorPeerGroupWeight.GeographyTypeCd		
	<b>Code ID</b>	Peer Group Geography Type This code element is non-editable. The installed values are: Geography Indicator Special Geography Indicator		
Type	The type of weighting being assigned to a peer group.			
	<b>Type</b>	List Box		
	<b>Required</b>	Yes		
	<b>DB Column</b>	VendorPeerGroupWeight.CalcTypeCd		
	<b>Code ID</b>	Peer Group Calc Weight This code element is non-editable. The installed values are: Food Stamp Elig Sales Geographic Indicator Registers Square Footage		

Control	Description			
Value	The weighting factor for the specified type.			
	<b>Type</b>	Text Box		
	<b>Required</b>	Yes		
	<b>Length</b>	Decimal 2		
	<b>Validation</b>	Numeric, Mask of 99%		
	<b>Display Only</b>	No	<b>Calculated</b>	No
	<b>DB Column</b>	VendorPeerGroupWeight.CalcValueNr		
Deactivate	Indicates the peer group weighting factor is or is not active.			
	<b>Type</b>	Check Box		
	<b>Display Only</b>	No	<b>Calculated</b>	No
	<b>DB Column</b>	VendorPeerGroupWeight.Status		

<b>Business Rules</b>
<ol style="list-style-type: none"> <li>1. Only active peer group values can be used in the peer group calculations of vendor management.</li> <li>2. The percentage values within the Peer Group Weighted grid should total 100% for each Geography. Display warning.</li> <li>3. The grids should be sorted as follows: Peer Group Geography Indicator Grid: Geography Value Peer Group Weighted Grid: Geography Type</li> </ol>

<b>Developer Notes</b>
1.

## 4 Vendor High Risks

This screen will allow the vendor manager to set up the state's vendor high risks.

These weight values are used to support the HRVA Combo Report. The following explains how the system uses these values.

In Vendor Management, the vendor manager can assess a high risk on a vendor for a time period using effective dates and end dates. These will be referred to as Manually Set Risks.

A primary capability of the Combo Report is to take current Manually Set Risks for all vendors, apply the Factor Weight and sort the vendors by the total 'Score'. So, the Factor Weight is a value that gives that risk its 'seriousness' rating (in context to other risks). They are whole numbers.

Another capability of the Combo Report is to take the results of HRVA Query Reports and mix their results into with the Manually Set Risk values. There are limited number of these Query Reports. For FI states, there are 7 of them: A, B, C, D, E, G and M. For EBT States, there are 2 of them: M and UPC. These are the only risks that need values in their Query Weight. Each Query Report has the ability (dependent on parameters to set a level) to determine the count of FIs that are found in violation. This count is passed to the Combo Report where it is taken times the Query Weight to get its report value. Due to this multiplication, the Query Weight is a decimal value (i.e. 0.002).

Here is a simple illustrative example:

Vendor Manager sets the following values in this table:

- o Risk A has a Query Weight of 0.02
- o Risk S has a Factor Weight of 30
- o Risk T has a Factor Weight of 20.

Vendor Manager has given Vendor 123 Risk S and Vendor 456 Risk S and T.

When the HRVA Reports are executed, Query Report A determines that Vendor 456 has 2000 FIs in violations and Vendor 789 has 3000 FIs in violation.

The Combo Report would "Score" like this:

- o Vendor 123 would get a score of 70 (Risk S for 30 and Risk A for 40 which is  $2000 \times 0.02$ )
- o Vendor 789 would get a score of 60 (Risk A for 60 which is  $3000 \times 0.02$ )
- o Vendor 456 would get a score of 50 (Risk S for 30, Risk T for 20)

> *Vendor Management Administration > High Risks*

Vendor High Risk Factors						
	Code	Description	Query Weight	Factor Weight	Sort Order	Deactivate
>	A	Small Amount of Variation in FI prices	0.004	15	1	<input type="checkbox"/>
	B	Large % of FI redeemed at same price	0.132	25	2	<input type="checkbox"/>
	V	New Vendor	0.000	40	3	<input type="checkbox"/>

Control	Description			
Add Row	Clicking the Add Row command button creates a new row in the data grid allowing the user to add another vendor high risk factor.			
	<b>Type</b>	Command Button		
	<b>Hot Key</b>	Alt + A		
Vendor High Risk Factors	The data grid is used to define the state's vendor high risk factors.			
	<b>Type</b>	Data Grid		
Code	This is the code of the high risk factor. This field is only editable when a new row is being added. Must be unique.			
	<b>Type</b>	Text Box		
	<b>Required</b>	Yes		
	<b>Length</b>	3		
	<b>Validation</b>	NA		
	<b>Display Only</b>	Yes, unless new row is being added	<b>Calculated</b>	No
	<b>DB Column</b>	VendorRiskType.TIPRiskCd		
Description	This is the description of the high risk factor that will appear in the list box.			
	<b>Type</b>	Text Box		
	<b>Required</b>	Yes		
	<b>Length</b>	50		
	<b>Validation</b>	NA		
	<b>Display Only</b>	No	<b>Calculated</b>	No
	<b>DB Column</b>	VendorRiskType.Name		
Query Weight	This is a numerical value that is applied to the number of items found in a 'report selected' high risk factors in the high risk vendor analysis combination report. Query weights are those applied to the query units found in factors that are supported by a high risk vendor queries.			
	<b>Type</b>	Text Box		
	<b>Required</b>	No		
	<b>Length</b>	Decimal 4,3		
	<b>Validation</b>	Numeric		
	<b>Display Only</b>	No	<b>Calculated</b>	No
	<b>DB Column</b>	VendorRiskType.QueryWeight		

Control	Description			
Factor Weight	This is a numerical value that is applied to the high risk factor (by itself) when it is not a 'report selected' high risk factor in the high risk vendor analysis combination report. Factor weights are a value assigned for weights that are not supported by a high risk vendor queries but rather by the high risk being currently assigned to the vendor.			
	<b>Type</b>	Text Box		
	<b>Required</b>	No		
	<b>Length</b>	Integer 8		
	<b>Validation</b>	Numeric		
	<b>Display Only</b>	No	<b>Calculated</b>	No
	<b>DB Column</b>	VendorRiskType.FactorWeight		
Sort Order	The sort order used to determine the display sequence of the items when displayed in a list box.			
	<b>Type</b>	Text Box		
	<b>Required</b>	Yes		
	<b>Length</b>	Integer 2		
	<b>Validation</b>	Numeric		
	<b>Display Only</b>	No	<b>Calculated</b>	No
	<b>DB Column</b>	VendorRiskType.DisplaySeqNr		
Deactivate	This will deactivate the high risk factor. This affects whether it is available in the list box when selecting vendor high risk factors.			
	<b>Type</b>	Check Box		
	<b>Display Only</b>	No	<b>Calculated</b>	No
	<b>DB Column</b>	VendorRiskType.Status		
<Last Modified By User and Date>	In the lower right-hand corner, the user and the date of the last update of the record are displayed.			
	<b>Type</b>	Text Box		
	<b>Required</b>	No		
	<b>Length</b>	NA		
	<b>Validation</b>	Mask of 'firstname lastname mm/dd/yyyy'		
	<b>Display Only</b>	Yes	<b>Calculated</b>	No
	<b>DB Column</b>	VendorRiskType.ModifyStfpID + VendorRiskType.ModifyDt		

**Business Rules**

1. Code must be unique. Display error.

**Developer Notes**

1. This will replace the transfer system VendorRisk code.
2. Deployment note:  
For FI States: the following records should be created as they follow the USDA standard for the TIP (bold records must be created for High Risk Vendor Analysis combination reports weights).
  - A - Small Amount of Variation in FI prices**
  - B - Large % of FI Redeemed at same price**
  - C - Unusually High Average FI Prices**
  - D - Redeemed Prices Higher than Price List**
  - E - Large % High Priced FIs**
  - F - Volume of WIC Business
  - G - Large Increase of Dollars Redeemed Over Time**
  - H - Large % of the area's WIC redemptions
  - I - WIC Sales unusually high % of total
  - J - High WIC to FS redemption ratio
  - K - WIC and FS sales unusually high
  - L - Participant/Other Complaints
  - M - Large # Participant Redeeming FI's Outside Area**
  - N - Large # of High Risk Participants
  - O - Large # FI's with consecutive serial numbers
  - P - Large % of manual FI's
  - Q - Excessive # returned checks
  - R - Past history of Violations and DQs
  - S - Associations with known violators
  - T - Multiple ownerships which include known violators
  - U - Short on authorized food items or no inventory
  - V - New Vendor
  - W - Random Selection (new USDA factor)
  - X - Other (Used when the State agency completed an investigation on a vendor and used some other type of high risk indicator that is not identified above)

For EBT States: the following records should be created as they follow the USDA standard for the TIP (bold records must be created for High Risk Vendor Analysis combination reports weights).

  - F - Volume of WIC Business
  - G - Large Increase of Dollars Redeemed Over Time**
  - H - Large % of the area's WIC redemptions
  - I - WIC Sales unusually high % of total

**Developer Notes**

J - High WIC to FS redemption ratio

K - WIC and FS sales unusually high

L - Participant/Other Complaints

**M - Large # Families Redeeming Outside Area**

N - Large # of High Risk Participants

R - Past history of Violations and DQs

S - Associations with known violators

T - Multiple ownerships which include known violators

U - Short on authorized food items or no inventory

V - New Vendor

W - Random Selection (new USDA factor)

X - Other (Used when the State agency completed an investigation on a vendor and used some other type of high risk indicator that is not identified above)

This is not a USDA standard but needs a record for high risk:

**UPC – Large Volume of Variations in UPC Prices**