

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM

**STORE APPLICATIONS - OMB NUMBER 0584-0008 - FORM FNS-252, FNS-252-E,
FNS-252-2, FNS-252-C, and OMB NUMBER 0584-0553 – FORM FNS-252-R**

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Background

The U.S. Department of Agriculture's Food and Nutrition Service (FNS) is the Federal agency responsible for the Supplemental Nutrition Assistance Program (SNAP). Section 9 of the Food and Nutrition Act of 2008, as amended, (the Act) (Title 7 U.S.C. 2018) requires that the FNS provide for the submission of applications for approval by retailers, wholesalers, meal service providers, certain types of group homes, shelters, and state-contracted restaurants that wish to participate in the SNAP. FNS is responsible to review the application in order to determine whether or not applicants meet eligibility requirements, and make determinations whether to grant or deny authorization to accept and redeem SNAP benefits. FNS is also responsible for requiring updates to application information and reviewing retail food store application at least once every five years to ensure that each firm is under the same ownership and continues to meet eligibility guidelines.

This submission to the Office of Management and Budget (OMB) is for the approval of information collection requirements imposed on retail food stores, wholesale food concerns, and food service organizations that apply for authorization to accept and redeem SNAP benefits, and for monitoring compliance and the continued eligibility of such respondents once authorized. Upon approval, these respondents are the "normal channels of trade" for delivery of SNAP benefits to low-income households. There are currently four application forms approved under OMB No. 0584-0008 - the Supplemental Nutrition Assistance Program Application for Stores, Form FNS-252 and FNS-252-E (paper and

online version, respectively); the Meal Service Application, Form FNS-252-2; and the Corporate Supplemental Application, Form FNS-252-C, used for individual (chain) stores under a corporation. In order to meet regulatory requirements regarding reauthorization, FNS also collects information from retail food stores using the Supplemental Nutrition Assistance Program Application for Stores – Reauthorization, Form FNS-252-R, which is approved under OMB No. 0584-0553. In our previous submission to OMB, FNS was granted approval to merge this information collection burden with the information collection associated with OMB No. 0584-0008, which FNS intends to do at this time.

In this submission to OMB, FNS is seeking approval to revise four forms: FNS-252 and FNS-252-E (paper and on-line, respectively); FNS-252-R, and FNS-252-2. The revisions to Forms FNS-252, FNS-252-E, and FNS-252-R are necessary to clarify questions regarding sales information; expand the Inventory Stock examples; clarify questions and instructions by re-wording written instructions and online help screens; and reformatting the application. FNS is also revising the Privacy Act Statement (PAS) and the Use and Disclosure notice on Forms FNS-252; FNS-252-E; FNS-252-R; and FNS-252-2. The revisions are needed in order to bring the format and content into conformance with the Agency’s Privacy Act System of Records Notice (SORN). The SORN titled “*USDA/FNS-9 Supplemental Nutrition Assistance Program Retailer Information*” was published in the Federal Register on December 27, 2010 at 75 CFR, Number 247, and is located on pages 81205 – 81209. Form FNS-252-C is not impacted by the proposed revision to the PAS and the Use and Disclosure notice because respondents are provided this information when they complete Form FNS-252. No public comments were received in response to this notice.

Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The need to collect information is established under the Act to determine the eligibility of retail food stores, wholesale food concerns, and food service organizations applying for authorization to accept and redeem SNAP benefits, and to monitor these firms for continued eligibility, and to sanction stores for non-compliance with the Act, and for Program management.

Section 9(a) of the Act requires food stores and meal services (firms) to submit applications to FNS for approval prior to participating in the SNAP. The Act specifies that only those applicants whose participation will “effectuate the purposes of the program” should be authorized. According to the Act, some of the factors to consider in making an eligibility determination of an applicant firm are the nature and extent of the food business conducted by the applicant; the volume of SNAP benefit business, which can reasonably be conducted by the applicant; and the business integrity and reputation of the applicant. FNS field office staff review a firm’s application in order to determine whether or not applicants meet eligibility

requirements, and make determinations whether to grant or deny authorization to accept SNAP benefits. FNS is also responsible for requiring updates to application information and reviewing retail food store applications at least once every five years to ensure that each firm is under the same ownership and continues to meet eligibility requirements.

Section 12 of the Act states that firms which violate the Act or regulations may be disqualified from Program participation, assessed a civil money penalty or fined.

As part of this process, the Agency must have a complete description of the business entity on the application to detect intentional or unintentional circumvention of the penalties for non-compliance with Program regulations.

In support of these responsibilities, the Social Security Act was amended in 1990 (42 U.S.C. 405(c)(2)(C)) to allow for the mandatory collection of the Social Security Number (SSN) of owner(s) or corporate officer(s) of a firm during the approval process of the store's application. In addition, Section 6109 of the Internal Revenue Code of 1986, as amended in 1990, permits the mandatory collection of the Employer Identification Number (EIN) from store owners. These requirements can be found at 7 CFR 278 and 279 of the SNAP regulations.

2. **Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

Information is collected primarily for use by the FNS in the administration of the SNAP. Part of FNS' responsibility is to accept applications from retail food establishments and meal service programs that wish to participate in SNAP. FNS field offices review a firm's application in order to determine whether or not applicants meet eligibility requirements and make determinations whether to grant or deny authorization to accept and redeem SNAP benefits. Forms FNS-252, FNS-252-E, and FNS-252-2 are used for this information collection requirement. FNS is also responsible for requiring updates to application information and reviewing that information to determine whether or not the firms or services continue to meet eligibility requirements. Form FNS-252-R is used for this information collection requirement. The information is retained by the appropriate FNS field office accepting, reviewing, and approving applications for initial authorization and reauthorization for stores and meal services.

The FNS and other Federal Government agencies examine such information during compliance reviews, audit reviews, special studies or evaluation efforts. Additional disclosure of this information may be made to other FNS programs and to other Federal, State or local agencies and investigative authorities when the SNAP becomes aware of a violation or possible violation of the Act. FNS may disclose information to the Department of Justice (DOJ), a court or other tribunal, or another party before such tribunal when the United State Department of Agriculture (USDA) is involved in a lawsuit or has an interest in litigation and it has been

determined that the use of such information is relevant and necessary, and the disclosure is compatible with the purpose for which the information was collected.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

FNS is committed to complying with the E-Government Act 2002, to promote the use of internet and other information technologies to provide increased opportunities for citizen access to Government information and services.

All forms associated with this information collection burden include the use of plain language based on the guidance published by the Securities and Exchange Commission "[A Plain English Handbook: How to Create Clear SEC Disclosure Documents](#)" published 1998. In order to provide better customer service and reduce the administrative burden, FNS streamlined and simplified the data collection burden imposed on our respondents. Questions are asked in a clear and concise manner. Sales and inventory examples are clarified to provide additional examples of items within the food categories.

FNS simplified the data collection burden imposed on our respondents by rewording or re-phrasing written instructions and online help screens. We have provided clearer examples regarding inventory stock and we have limited the number of questions asked on Form FNS-252-R that are relevant to the reauthorization process. Data from the Store Tracking and Redemption System (STARS) is auto-populated on the paper and electronic Form FNS-252-R application, thereby reducing the amount of data fields respondents need to complete. Retailers are only required to select a “No” response if the information FNS has on file is no longer correct. This feature allows questions to be filtered and decreases the time retailers will spend on completing Form FNS-252-R.

FNS will continue to promote and offer an electronic alternative to the paper application to respondents in conjunction with the E-Government Act. Firms designated by FNS due for reauthorization will have the option of completing and submitting an online application via the Internet on the FNS web site in lieu of completing and mailing a paper application to FNS. At this time, the online application is an option, not a requirement. Form FNS-252-E is available to the public at: <http://www.fns.usda.gov/snap>. Approximately 57 percent of retailers submit applications on line.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.**

FNS solely grants and monitors the SNAP Retailer and Meal Service authorization to those retailers who want to participate in the Supplemental Nutrition Assistance Program. The Agency goal is to have recent and accurate information on all firms authorized in the Program. There are some similar information collection efforts available; however, it does not meet the current needs of this data collection requirement. The applicant's SSN and EIN are collected elsewhere in the government. It is necessary to collect it from a member of the public again because within the confines of the law we are restricted from sharing this information. FNS also requires an update to the information previously submitted by the retailer and this data collection is not available from any other source.

Owner identifying information enables the Agency to determine a firm's eligibility for participation in the Program. The collection of this information is necessary for Program administration, to prevent fraud and abuse of Program benefits, and for the applicant to verify their own personal information. Further, the duplication of information collected from other government sources is necessary for the effective management of the SNAP, Social Security Administration and the Internal Revenue Service. The information FNS has on file will not suffice.

5. **If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The Act requires that FNS collect certain information from all firms, regardless of size, to ensure the efficient and effective operation of SNAP. This information collection does not adversely impact small business or other small entities. A small business is treated like other firms.

In an effort to minimize the impact on all respondents, including small businesses, we use plain language, provided clearer instructions to guide the applicant to report accurate information and information collected is limited to what is necessary to comply with statutory provisions and to protect program integrity without imposing undue burden on respondents.

In addition to a paper application, FNS offers an online application as an alternative for retailers who wish to complete and submit authorization and reauthorization information via the Internet on the FNS web site. One of the enhanced features of completing the online reauthorization application is that several data fields will be auto-populated based on the information FNS has on file in STARS. This minimizes the administrative burden placed on all firms applying for continued participation in SNAP, including small businesses. FNS estimates that 85 percent of retailers are considered small business.

- 6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

FNS' ability to ensure that only eligible stores are participating and that participating stores abide by Program rules hinges on gathering and maintaining accurate information. The requirement of this information collection is necessary to ensure efficient and effective operation of the Program. If we did not collect, or were unable to collect, the information contained on the application or reauthorization application, the consequences to the Federal program is the Agency's reduced ability to effectively monitor accountability for program compliance and our ability to detect fraud and abuse would be severely jeopardized. Additionally, we would be out of compliance with the law and our own regulations.

Failure to respond to request for information or to provide reauthorization information constitutes a violation of program regulations and the Act for which respondents may be denied or withdrawn from SNAP participation. Only a change to legislation would authorize less frequent reporting.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported.**

A 60-day notice was published in the Federal Register on December 23, 2010, at 75 FR 246. No public comments were received in response to this notice.

During Fiscal Year 2010, FNS consulted with a standing advisory group of regional, field and headquarters staff on revision to Form FNS-252, FNS-252-E and, FNS-252-R. During the regular monthly meetings of the workgroup, members discussed, among other things, content and clarity of the forms. Suggestions on how to clarify sales and inventory questions, as well as suggestions to the form design were provided. In addition, the results of the 2010 evaluation of the reauthorization process, included suggestions from FNS staff at various levels, for clarification and how to improve the design format of Form FNS-252-R.

- 9. Explain any decision to provide any payment or gift to respondents, other than**

re-enumeration of contractors or grantees.

We do not provide any payment or gifts to the respondents for their submission of data or information collection.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The Department will comply with the Privacy Act of 1974. The application for reauthorization, and the information contained on the application which contains the personal identifying information on retail and wholesale store owners and officers, and/or owners and officers associated with other entities, are located in FNS field offices throughout the United States and in a host computer database. The host computer server which contains the application information stored in the STARS database is located at the Benefit Redemption Systems Branch in Minneapolis, Minnesota.

The application contains the following personal information regarding owners and officers: Name, home address, Social Security Number (SSN), and date of birth (DOB). The SSNs are collected only from owners of sole proprietorships, partnerships, principal shareholders of private corporations, and officers of cooperatives are in the STARS database.

FNS published a Privacy Act System of Records Notice (SORN) to specify the uses to be made of the information in this collection. This Notice titled “*USDA/FNS-9 Supplemental Nutrition Assistance Program Retailer Information*” was published in the Federal Register on December 27, 2010, at 75 CFR, Number 247, and is located on pages 81205-81209.

Section 9 of the Act, (Title 7 U.S.C. 2018), authorizes collection of the information on the application. Section 278.1(b) of the SNAP regulations provides for the collection of the owners’ SSN, EIN, and tax information.

- 11. Provide additional justification for any question of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

By law, we are allowed to ask applicant firms for their SSNs and EINs. Although applicant firms are not required to disclose these numbers to us, we reserve the right to deny an application that does not have these numbers because we cannot guarantee the legitimacy of the business, owner(s) or corporate officers.

The use and disclosure of SSNs and EINs obtained by applicants is covered in the Social Security Act and in the Internal Revenue Code. In accordance with the Social Security Act and the Internal Revenue Code, applicant SSNs and EINs may be disclosed only to other Federal agencies authorized to have access to SSNs and EINs and maintain these numbers in their files, and only when the Secretary of Agriculture determines that disclosure would assist in verifying and matching such information against information maintained by such other agency [42 U.S.C. 405 (c)(2)(c)(iii); 26 U.S. C. 6109(f)].

Questions on business practices and ethics, including criminal records, are necessary to ensure the business integrity of authorized firms. False responses to these questions on the application are grounds for denial, disqualification, fines and/or imprisonment and contribute to the Office of Inspector General's (OIG) ability to better support the cases referred to court for SNAP prosecutions.

12. Provide estimates of the hour burden of the collection of information.

This submission to OMB is for the approval of the revised application for retailers Forms FNS-252, FNS-252-E, and FNS-252-R; for the revised application for meal services, Form FNS-252-2; and for the continued approval of the Addendum to the retailer application, Corporate Supplemental Application, Form FNS-252-C that is used for individual (chain) stores under a corporation. In addition to these forms, FNS may conduct an on-site store visit of the firm. The store visit of the firm helps

FNS confirm that the information provided on the application is correct. A FNS representative or contractor obtains permission to fill in the store visit checklist, photograph the store and asks the store owner or manager about the continued ownership of the store. The total estimated annual burden associated with this information collection is 16,125.48 hours, rounded to 16,125 (15,698.48 hours for the application forms + 427 hours for the FNS Store Visit).

A. Indicate the number of respondents, frequency of response, annual hour burden and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in item 13 of OMB Form 83-1.

There are currently four application forms currently approved under OMB No. 0584-0008. In our previous submission to OMB, FNS received approval to merge the information collection associated with Form FNS-252-R, approved under OMB No. 0584-0553 with the information collection approved under OMB No.0584-0008, which FNS intends to do at this time. For this submission to OMB, FNS is seeking approval of the Forms FNS-252, FNS-252-E, FNS-252-R, and FNS-252-2; and for the continued use of Form FNS-252-C.

Burden estimates associated with the application forms are determined from information maintained in STARS and are based on the total number of currently

authorized or newly authorized retail stores and meal services. Fiscal Year (FY) 2011 -2013 projections are based on FY 2010 data obtained from the STARS database, as this is the most comprehensive and complete data available to us at this time. The number of respondents is 107,231.84 and the number of responses per respondent is 1. Further information is provided below.

Form FNS-252:

For Form FNS-252 and FNS-252-E burden estimates, we used 38,623 as the base number of applications received. We estimate an annualized increase of 10 percent in each FY, and we used 46,875.44 $(42,485.30 + 46,733.83 + 51,407.21 / 3 = 46,875.44)$ in our calculations for FY 2011. We estimate approximately 20,156.43 $(43\% \times 46,875.44)$ applications received will be submitted using the paper application, Form FNS-252. We estimate that it takes respondents, on average, 11 minutes (or 0.18370) to complete FNS-252, and a total burden hours calculated to be 3,702.73 $[20,156.43 \times 0.18370]$.

Form FNS-252-E:

In FY 2011, we estimate approximately 26,719 (57% x 46,875.44) retailers will complete the online application, Form FNS-252-E. We estimate that it takes respondents, on average, 10 minutes (or 0.16700) to complete FNS-252-E, and a total burden hours calculated to be 4,462.07 [26,719 x 0.16700].

Retailers using Form FNS-252-E must also first self-register for a Level 1 access account through the USDA eAuthentication system in order to initially start an online application. USDA eAuthentication facilitates the electronic authentication of an individual and it takes approximately 8 minutes (or .13360) to obtain an eAuthentication account. The total burden hours for eAuthentication are calculated to be 3,569.65 [26,719 x 0.13360].

Form FNS-252-2:

In FY 2010, approximately 1,074 Meal Service Applications, Form FNS-252-2 were submitted to FNS. In FY 2011, we estimate on average, an annualized increase of 10 percent (1,303.47) of applicants will complete Form FNS-252-2. We estimate that it takes respondents, on average, 11 minutes (0.18370) to complete Form FNS-252-2, and a total burden hours calculated to be 239.44 [1,303.47 x 0.18370].

Form FNS-252-C:

In FY 2010, approximately 7,346 Corporate Supplemental Application, Form FNS-252-C used for individual (chain) stores under a corporation were submitted to FNS. In FY 2011, we estimate an annualized increase of 2 percent of applications 7,643.77 ($7,492.92 + 7,642.77 + 7,795.63 / 3 = 7,643.77$) will be submitted on Form FNS-252-C. We also estimate that it takes retailers 5 minutes (or 0.08350) to complete Form FNS-252-C, and a total burden hours calculated to be 638.25 [$7,643.77 \times 0.08350$].

Form FNS-252-R:

The estimated burden hours associated with Form FNS-252-R is determined from the number of currently reauthorized (21,291) stores in FY 2010 as the base number for our estimates. We estimate an annualized increase of 10 percent in each FY. We estimate 25,840.17 ($23,420.10 + 25,762.11 + 28,338.32 / 3 = 25,840.17$) individual firms will be subject to reauthorization in FY 2011. We estimate that it takes respondents 7.10 minutes (0.11944) to complete Form FNS-252-R, and a total burden hours calculated to be 3,086.34 [$25,840.17 \times 0.11944$].

Store Visit estimates:

During authorization or reauthorization, FNS may conduct an on-site store visit of the firm. An FNS representative or store visit contractor confirms that the information provided on the application is correct. The store owner or manager is

asked about the continued ownership of the store and obtains permission to fill in the store visit checklist and photograph the store. We estimate an FNS representative or contractor interacts for a maximum of one minute (0.11670) with new applicants. We estimate that 25,569 store visits will be conducted for first time authorizations in FY 2011, and a total burden hours calculated to be 427 [25,569 x 0.01670].

A. Table A.12.1 – Reporting Estimate of Hour Burden:

| Affected Public | (a) Description of Collection Activity | (b) Form Number | (c) No. Respondents | (d) No. Responses Per Respondent | (e) Total Annual Responses (cxd) | (f) Hours Per Response | (g) Total Burden (exf) |
|-------------------------------|---|--------------------|------------------------|-------------------------------------|-------------------------------------|---------------------------|---------------------------|
| Reporting | | | | | | | |
| Retailers | Applications Received | 252 | 20,156.43 | 1.00 | 20,156.43 | 0.18370 | 3,702.73 |
| | Applications Received | 252-E | 26,719 | 1.00 | 26,719 | 0.16700 | 4,462.07 |
| | E-Authentication | 252-E | 26,719 | 1.00 | 26,719 | 0.13360 | 3,569.65 |
| | Applications Received | 252-2 | 1,303.47 | 1.00 | 1,303.47 | 0.18370 | 239.44 |
| | Applications Received | 252-C | 7,643.77 | 1.00 | 7,643.77 | 0.08350 | 638.25 |
| | Store Visits | | 25,569.00 | 1.00 | 25,569.00 | 0.01670 | 427.00 |
| | Reauthorization | 252-R | 25,840.17 | 1.00 | 25,840.17 | 0.11944 | 3,086.34 |
| Total Reporting Burden | | | 107,231.84 | | 133,950.84 | | 16,125.48 |
| | | | No. of Respondents | Est. Annual Responses | Est. Total Annual | Est. Hours Per | Est. Total Annual |

| | | Per Respondent | Responses | Response | Burden for this ICR |
|--|------------|----------------|------------|----------|---------------------|
| SUMMARY OF BURDEN FOR THIS COLLECTION | 107,231.84 | 0.76099 | 133,950.84 | 0.88764 | 16,125.48 |

*Note: The respondents for application 252-E are the same respondents for E-Authentication and therefore not double counted in the total number of respondents.

B. Provide estimates of annualized costs to respondents.

The cost to the public is based on an average estimate wage rate of \$53.15 per hour. For hourly cost estimation, we went to the Bureau of Labor Statistics (BLS) website (http://www.bls.gov/oes/current/naics4_445100.htm), and used the May, 2009, data available from the National Industry-Specific Occupational Employment and Wage Estimates for Grocery Stores. Within this group, we further used the Standard Occupational Classification code number 11-1021 – General and Operations Manager (<http://www.bls.gov/oes/current/oes111021.htm>) based on this data, the mean hourly wage estimate was \$53.15. This wage amount was used as our basis for computing total annual cost burden to the respondents, as it is the most current data provided by the BLS. The total annual cost to the public is approximately \$53.15 per hour with a total annual cost to the respondents estimated to be \$857,069.26 (General and Operations Manager @ \$53.15 per hour x 16,125.48 Burden Hours = \$857,069.26). There is no cost to the public for conducting store visits.

13. Provide estimates of the total annual cost burden to respondents or record

keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal government. Also provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The estimated cost to the Federal government is \$62,240.16. This cost includes staffing support costs of \$8,740.16 for the employee, labor and material for collecting the information; development of the 60-day Federal Register notice and the ICB package based on 200 hours for the writer and 2 hours for the supervisor at the hourly rates of \$43.19 and \$50.58 respectively, and \$48,000 in Federal cost for the development of the revised retailer authorization application (paper and online); the revised reauthorization application (paper and online); revision to the Privacy Act Statement for Form FNS-252-2, including contractor services for enhancements to the functionality of the STARS system and the development of computer screens and reports to support the collection; and \$5,500 for document translation services.

It is estimated that the re-occurring annual cost to the Federal government is \$117,471.01. This includes; staffing support costs of \$79,579.17 (using the national average of \$32.90 per hour at a GS 11, Step 10 x 2,418.82 hours (16,125.48 hours x 15%)) for evaluation and processing of an estimated 20,128 retailer applications (107,231.84 respondents – 26,719 eAuthentication = 80,512.84 respondents x 0.25), and review of annual documentation from reports and store visits]; printing costs of \$9,468.84; and assembly and mailing costs of \$28,423. FNS eliminated shipping and storage costs by printing the initial application and reauthorization application on demand from our support center in Minneapolis.

FNS pays approximately \$105.00, on average, per store visit. We have a multi-year contract with a company to carry out these visits on behalf of FNS. In FY 2010, FNS spent approximately \$2.9 million on store visits.

15. Explain the reasons for any program changes or adjustments.

This is a revision of a currently approved collection related to the authorization and reauthorization of retail firms participating in the SNAP. The estimated total annual burden hours associated with this information collection requirement is 16,125 hours. This is an increase of 3,259 hours due to the merging of the information from OMB No. 0584-0553. The remaining 6,930 is due to an increase in the number of respondents due to increase participation. The revisions to Forms FNS-

252; FNS-252-E; and FNS-252-R are necessary to clarify questions and instructions regarding sales information and Inventory Stock examples; re-phrase written instructions and online help screens; format and design changes to visually enhance the application. By re-phrasing questions and re-formatting the design, no additional burden time is added to this information collection.

A minor revision to the Privacy Act Statement (PAS) and Use and Disclosure notice on Forms FNS-252, FNS-252-E, FNS-252-R, and FNS-252-2 is needed in order to bring the format and content into conformance with the Agency's SORN. A notice to revise the SORN was published in the Federal Register on December 27, 2010 at 75 CFR 81205. The public was not informed of this change because the SORN was published after the Program's 60-day notice was published in the Federal Register. No public comments were received in response to the SORN notice.

An explanation of adjustment follows:

Adjustments:

In accordance with Section 278.1(j) – (n) of the SNAP regulations, all firms must be authorized at least once every five years. FNS collects information from retail food stores using the Supplemental Nutrition Assistance Program Application for Stores – Reauthorization, Form FNS-252-R, which is approved under OMB No.

0584-0553. In our previous submission to OMB, Form FNS-252-R was not included in the information collection associated with OMB No. 0584-0008.

The revisions to Form FNS-252-R are necessary to expand the Inventory Stock examples; revise the Certification Statement in the General Instruction section; obtain the number of check-out registers; and provide an option to receive email from FNS. The previous burden associated with this information collection was 7 minutes. We estimate an additional burden of 10 seconds for respondents completing Form FNS-252-R, and the new estimated burden, on average, is 7.10 minutes.

We revised the format and made minor content changes to the Privacy Act Statement and Use and Disclosure notice on all application forms except Form FNS-252-C, Corporate Supplemental Application (Addendum to SNAP Application for Stores). The revisions are needed to bring the format and content into conformance with the Agency's current policy. No additional burden was placed upon the respondents as a result of this change.

The estimated total annual burden hours associated with this information collection requirement is 16,125.48 hours, rounded to 16,125 hours. This is an increase of 6,930 hours due to the merging of 3,259 hours from OMB No. 0584-0553 with the current burden of 5,936 hours from OMB No. 0584-0008.

Other Adjustments

Our estimates for the number of respondents completing the authorization and reauthorization forms are subject to change in each FY as the currently authorized retailer number fluctuates as retailers enter and leave the program throughout the year. The estimate total annual burden hours associated with this information collection is 16,125.48 hours. The number of program respondents is 107,231.84. The increase in burden hours is attributed to program growth. In our initial estimations, the base number used to determine the affected respondents and burden hours was calculated using data as of August 2010, as this was the most current data available to us at the time. Year-end data for FY 2010 was received after the Federal Register notice was published.

- 16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

There are no plans for tabulation and publication of this collection of information.

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The Agency will publish the expiration date on the information collection forms.

- 18. Explain each exception to the certification statement identified in Item 19
"Certification for Paperwork Reduction Act."**

There are no exceptions to this certification statement.