

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM
STORE APPLICATIONS - OMB NUMBER 0584-0008 - FORM FNS-252, FNS-252-E,
FNS-252-R, FNS-252-2, FNS-252-C and the proposed FNS-252-FE

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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. 2011 et. seq.) requires that 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 SNAP benefits and to ensure program integrity. FNS is also responsible for reviewing retail food store participation 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, farmers' markets, wholesale food concerns, and food service organizations that apply for authorization to accept SNAP benefits and to monitor them for 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 five 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; the Corporate Supplemental Application, form FNS-252-C, used for individual (chain) stores under a corporation; and the Supplemental Nutrition Assistance Program Application for Stores – Reauthorization, form FNS-252-R.

In this submission to OMB, FNS is seeking approval to renew the current information collection, and to make enhancements to forms FNS-252 (English and Spanish), FNS-252-E (paper and on-line, respectively) and FNS-252-R. The revisions are necessary to clarify or to re-word questions, instructions, and examples by making design and formatting changes to the paper and online application and help screens; revise the content and design formation of the ownership and signature titles on form FNS-252 to be consistent with this information found on form FNS-252-R; and add a new, optional question, for retailers to provide additional information or comments to FNS.

FNS is also revising Form FNS-252-2 the Meal Service Types contained in Part 1 of the application. The current title of the Private For-Profit Restaurant or Private For-Profit Meal Delivery Service will be revised to Private For-Profit Restaurant. The option to select the Private For-Profit Meal Delivery type will also be removed from this category and added to the Meal Delivery Service category. Additional revisions also include adding a meal service location address ; delete “optional” and add “required” to email address; and revise the Agreement and Signature section to further clarify information regarding violations also pertain to individual(s) completing the application.

FNS is amending all SNAP application forms, where applicable to (1) expand the Use and Disclosure section – routine uses to clarify the use of information for conducting computer matches; (2) to collect an email address for each owner; (3) add a new question asking if the applicant has other stores that currently accept SNAP benefits; (4) add a new question asking if the applicant has even been disqualified from receiving SNAP benefits as a recipient for intentional program violation (IPV) or fraud; and (5) re-word or re-phrase the General Instruction section and on-line help screens to clarify information requested. FNS FNS-252-C is not impacted by the proposed revision to 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.

FNS is also seeking approval to for a new on-line application created specifically for farmers' market applicants, form FNS-252-FE, Supplemental Nutrition Assistance Program Farmers' Market Application. Currently, retail food stores and farmers' markets complete the same application, either form FNS-252 or FNS-252-E when applying for initial SNAP authorization. Data collected on form FNS-252-FE will be modified from the approved information collection associated with form FNS-252 and FNS-252-E. Questions and instructions will be revised to clarify and/or re-phrase information requested, specific to the targeted group of respondents. The proposed information collection will otherwise be used in the same manner as the existing form FNS-252 or FNS-252-E application. The Program defines a farmers' market as a multi-stall market at which farmer-producers sell agricultural products directly to the general public at a central or fixed location.

Upon OMB approval, FNS intends to incorporate form FNS-252-FE into the information collection associated with OMB No. 0584-0008, as these respondents are also considered the “normal channels of trade” for delivery of SNAP benefits to low-income households.

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.**

This is a revision of a currently approved collection. 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 staff reviews 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 staff reviews 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. Forms FNS-252, FNS-252-E, FNS-252-2, and the proposed FNS-252-FE 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 FNS and is used for reviewing and approving applications for initial authorization and reauthorization.

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 (E-Gov), 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. FNS simplified the data collection burden imposed on our respondents by re-wording or re-phrasing written instructions and online help screens. 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 online 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. Firms designated by FNS due for reauthorization will complete and submit an online application via the Internet on the FNS web site in lieu of completing and mailing a paper application to FNS.

FNS will continue to promote and offer an electronic alternative to the paper application to respondents in conjunction with the E-Government Act. In this submission to OMB, FNS is seeking approval to create the on-line form, FNS-252-FE, designed specifically for Farmers’ Markets. FNS streamlined and simplified the data collection burden imposed on this group of respondents by re-wording or re-phrasing questions, written instructions and online help screens. The form FNS-252-E is available to the public at <http://www.fns.usda.gov/snap>. Approximately 87 percent of retailers submit applications online. FNS also intends to make form FNS-252-FE available online at this same website.

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, Farmers' Market, 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 the respondent 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.

This information collection does not adversely impact small business or other small entities. The Act requires that FNS collect certain information from all firms, regardless of size, to ensure the efficient and effective operation of SNAP. 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 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 information FNS has on file in STARS. This minimizes the administrative burden placed on all firms by applying for continued participation in SNAP, including small businesses. FNS estimates that 85 percent or 12,776 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 integrity, efficiency and effectiveness in 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 that would require the collection of information to be conducted in a manner that is inconsistent 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 March 5, 2014, at 79 FR 12464. No public comments were received in response to this Notice.

Since our last submission to OMB, FNS has received comments from various farmers and farmers' market advocates stating the current application, form FNS-252 or FNS-252-E, does not address their business process and discussed among other things, questions, content, and clarity of the current application form.

Comments received were not based on the 60-day Federal Register Notice, but based on user feedback throughout the year. Suggestions how to clarify sales and inventory questions, as well as re-wording

questions and instructions by using terminology that is specific to the targeted audience were provided. As a result of such feedback, FNS is creating form FNS-252-FE specifically for Farmers' Markets.

FNS also received comments from respondents completing the 2013 reauthorization process. Suggestions for clarification on how to report a store name change, or update the mailing address were made. FNS adopted this suggestion and a new, optional question is being added to form FNS-252-R to obtain any additional information or comments that respondents would like to provide to FNS, such as a store name change, or updated mailing address, etc.

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.

FNS certifies that the information collection complies with the Privacy Act of 1974. The application for authorization, and the information contained on the reauthorization 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 at the Retailer Service Center in Washington, DC, in FNS 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 FNS' Office of Information Technology in Alexandria, Virginia.

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.

The total estimated annual burden associated with this information collection is rounded to 15,986.28 hours, rounded to 15,986 (11,278.84 hours for the application forms + 4,054.35 for e-Authentication + 653.09 hours for the FNS Store Visit). All calculations provided in Table A.12.1 are rounded to whole numbers.

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 five application forms currently approved under OMB No. 0584-0008. For this submission to OMB, FNS is seeking approval to add form FNS-252-FE to the information collection associate with forms FNS-252, FNS-252-E, FNS-252-R, FNS-252-2; and 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. The number of respondents is 150,030 and the number of responses per respondent is 1.

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 15,985 hours (11,278 hours for the application forms + 4,054 for E-Authentication + 653 hours for the FNS Store Visit). Further information is provided below.

Form FNS-252:

For the burden associated with forms FNS-252, FNS-252-E and FNS-252-FE, for initial authorization, we used the number of applications received as of July 31, 2013 (32,405) as the base number for current estimates. Based on Program growth, we estimate a 2 percent annualized increase in each Fiscal Year (FY), and we used 33,718.56 ($33,053.10 + 33,714.16 + 34,388.44/3 = 33,718.55$) in our calculations for FY 2014. We estimate approximately 3,371.85 ($10\% \times 33,718.55$) applications received will be submitted using the paper application, Form FNS-252. We

estimate that it takes respondents, on average, 11.10 minutes (or 0.18638) to complete FNS-252, and a total burden hours calculated to be 628.44 (3,371.85 x 0.18638).

Form FNS-252-E:

In FY 2014, we estimate approximately 29,335.39 (87% x 33,718.55) retailers will complete the online application, form FNS-252-E. We estimate that it takes respondents, on average, 10.6 minutes (or 0.16861) to complete form FNS-252-E, and a total burden hours calculated to be 4,946.24 (29,335.39 x 0.16861).

Form FNS-252-FE:

Of the applicants currently using form FNS-252 or FNS-252-E, we estimate approximately 1,011.56 (3% x 33,718.85) Farmers' Market respondents will complete form FNS-252-FE. We estimate that it takes respondents, on average, 10.6 minutes (or 0.16861) to complete FNS-252-FE, and a total burden hours calculated to be 170.55 (1,011.56 x 0.16861).

eAuthentication:

Applicants using form FNS-252-E or FNS-252-FE 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 0.13360) to obtain an eAuthentication account. We estimate approximately 30,346.95 (29,335.39 (FNS-252-E) + 1,011.56 (FNS-252-FE)) retailers and farmers' market applicants will register for Level 1 access. The total burden hours for eAuthentication are calculated to be 4,054.35 (30,346.95 x 0.13360).

Form FNS-252-2:

In FY 2013, approximately 877 Meal Service Applications, Form FNS-252-2 were submitted to FNS. We used this number as the base number for current estimates. We estimate on average, a 1 percent annualized increase in each FY, and we used 894.65 (885.77 + 894.62 + 903.56/3 = 894.65) will complete Form FNS-252-2 in our calculations for FY 2014. We estimate that it takes respondents, on average, 11.38 minutes (0.19416) to complete Form FNS-252-2, and a total burden hours calculated to be 173.70 (894.65 x 0.19416).

Form FNS-252-C:

Approximately 3,539 Corporate Supplemental Application, Form FNS-252-C used for individual (chain) stores under a corporation were submitted to FNS in FY 2013. We estimate on average, an annualized increase of 1percent of applications 3,610.25 (3,574.39 + 3,610.13 + 3,646.23/3 = 3,610.25) will be submitted on form FNS-252-C. We also estimate that it takes retailers 5 minutes (or 0.0835) to

complete Form FNS-252-C, and a total burden hours calculated to be 301.45 (3,610.25 x 0.0835).

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 the respondent. Approximately 37,584 store visits were conducted in FY 2013, and we used this as our basis for our calculations. Due to program growth and program integrity initiatives, we estimate a 2 percent annualized increase in each FY. We estimate 39,107.50 store visits will be conducted $(38,335.68 + 39,102.39 + 39,884.43/3 = 39,107.50)$ in FY 2014, and a total burden hours calculated to be 653.09 $(39,107.50 \times 0.01670)$.

Form FNS-252-R:

The estimated burden hours associated with form FNS-252-R is determined from the number of currently reauthorized (28,083) stores. We used FY 2013 as the base number for our estimates due to the current reauthorization cycle currently in

process at this time. We estimate on average, an annualized increase of 22 percent in each FY. We estimate 42,351.48 stores will be subject to reauthorization in FY 2014 ($34,261.26 + 41,798.73 + 50,994.45/3 = 42,351.48$). We estimate that it takes respondents 7.9 minutes (0.11944) to complete form FNS-252-R, and a total burden hours calculated to be 5,058.46 ($42,351.48 \times 0.11944$).

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 (cx)	(f) Hours Per Response	(g) Total Burden (ex)	Previous Submission Total hours	Difference Due to Program Changes	Difference Due to Program Adjustments
Reporting										
Retailers	Applications Received	252	3,372	1	3,372	0.18638	628	3,702.73		-3074.73
	Applications Received	252-E	29,335	1	29,335	0.16861	4,946	4,462.07		483.93
	E-Authentication	252-E and FNS-252-FE	30,347	1	30,347	0.1336	4,054	3,569.65		484.35
	Applications Received	252-FE	1,012	1	1,012	0.16861	171	-	171.00	
	Applications Received	252-2	895	1	895	0.19416	174	239.44	-65.44	
	Applications Received	252-C	3,610	1	3,610	0.0835	301	638.25		-337.25
	Store Visits		39,108	1	39,108	0.0167	653	427.00		226.00
	Reauthorization	252-R	42,351	1	42,351	0.11944	5,058	3,086.34		1971.66
	Total Reporting Burden		150,030	1	150,030	15,986			
			No. of Respondents	Est. Annual Responses Per Respondent	Est. Total Annual Responses	Est. Hours Per Response	Est. Total Annual Burden for this ICR	Previously Approved Burden	Difference due to Program Changes	Difference Due to Program Adjustments
SUMMARY OF BURDEN FOR THIS COLLECTION			150,030	1	150,030	0.106552	15,986	16,125.48	105.56	-246.04

*Note: the respondents for the 252-E and the 252-FE 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 for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

The estimate of respondent cost is based on 2012 Bureau of Labor Statistics (BLS) hourly mean wage for grocery store general and operations manager, found at <http://www.bls.gov/oes/current/oes111021.htm>. 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 estimated total annualized cost to the respondent is \$882,746.92 (General and Operations Manager wage @ \$55.22 per hour x 15,986 Burden Hours). 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 \$1,274,331.04. This cost includes staffing support costs of \$18,831.04 for the employee, labor and material for collecting the information; development of the 60-day Federal Register notice and the information collection request (ICR) package based on 400 hours for the writer at a General Schedule (GS) wage of a GS 12 Step 8 and 16 hours for the Branch Chief at a GS 14 Step 4 wage based on the 2014 Washington DC-Northern Virginia locality area hourly rate of \$44.83 and \$56.19, respectively, and \$2,000 in Federal cost for contractor support for revisions to forms FNS-252, 252-R and 252-2; and approximately \$1,248,000 for contractor services for enhancements to the functionality of the STARS system and the development of computer screen and reports to support the collection; and \$5,500 for documentation translation services.

Additionally, it is estimated that the re-occurring annual cost to the Federal government is \$174,892.19. This includes; staffing support costs of \$94,549.19 (using an average GS 11, Step 10 wage of \$39.43 per hour x 2,397.90 hours (15,986 burden hours x 15%)) for evaluation and processing of an estimated 29,920.75 retailer applications (150,030 respondents – 30,347 eAuthentication = 119,683 respondents x 0.25), and review of annual documentation from reports and store visits]; printing costs of \$6,290; and assembly and mailing costs of \$74,053. FNS

eliminated shipping and storage costs by printing the initial application and reauthorization application on demand from our Retailer Service Center in Washington DC.

FNS pays approximately \$106.42, 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 2013, FNS spent approximately \$4 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 currently approved burden inventory of OMB No. 0584-0008 is 16,125.48 hours. Due to program changes and/or adjustments, the estimated annual burden is 15,986.25, a decrease of 139.23 hours. The estimated total number of annual responses increased. The current total number of responses is 133,951; FNS is seeking 150,030 as an estimated total annual responses. This revision reflects an increase of 16,079 total annual responses.

An explanation of program changes and adjustment follows:

Program Changes:

The revisions to forms FNS-252; FNS-252-E; FNS-252-R and FNS-252-2 are necessary in order to (1) clarify and/or re-word questions, instructions, and examples by making design and formatting changes to the paper and on-line application and help screens; (2) revise the content and design formation of the ownership and signature titles on form FNS-252 to be consistent with information found on form FNS-252-R; (3) add a new question asking retailers for the name and address of the company that provides the EBT equipment and services when completing the reauthorization application; and (4) add a new, optional question, for retailers to provide additional information or comments to FNS. The types of additional information or comments could include any special circumstances that the retailer would want FNS to know, or who FNS should contact for questions about the application.

FNS is also revising form FNS-252-2 in order to (1) expand the meal service type categories regarding private ownership and meal delivery service entries; (2) add a meal service location address; (3) delete “optional” and add “required” to email address; (4) make format and design changes to visually enhance the application; and (5) revise the Agreement and Signature section to further clarify information regarding violations also pertain to individual(s) completing the application.

FNS is amending all SNAP application forms, where applicable to (1) expand the Use and Disclosure section – routine uses to clarify the use of information for conducting computer matches; (2) to collect an email address for each owner; (3)

add a new question asking if the applicant has other stores that currently accept SNAP benefits; (4) add a new question asking if the applicant has even been disqualified from receiving SNAP benefits as a recipient for intentional program violation (IPV) or fraud; and (5) re-word or re-phrase the General Instruction section and on-line help screens to clarify information requested.

FNS is also seeking permission to incorporate a new Farmers' Market application in this information collection. Currently, individual retail food stores and wholesale food concerns, along with farmers' markets and produce stands complete and submit forms FNS-252 and FNS-252-E. A farmers' market is defined as a multi-stall market at which farmer-producers sell agricultural products directly to the general public at a central or fixed location. FNS has received comments from various stakeholders including farmers and farmer's market advocates that the application title; retail food store questions; instructions and terminology do not address their business process and practices; and may be confusing to this unique group of respondents.

In order to reduce confusion and address any barriers to program participation respondents may have, FNS is creating a new online application specifically for farmers' markets, form FNS-252-FE, Supplemental Nutrition Assistance Program Farmers' Market Application. The data collected on form FNS-252-FE is modified from the approved information collection associated with form FNS-252-E. Questions and instructions are revised to clarify and/or re-phrase information

requested, specific to the targeted group of respondents. The proposed information collection will otherwise be used in the same manner as the existing form FNS-252-E application.

Retailer and farmers' market applicants wishing to complete an online application (forms FNS-252-E and FNS-252-FE) 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. There is no additional burden placed upon respondents obtaining a Level 1eAuthentication or completing form FNS-252-FE

We anticipate the implementation of the on-line application, Form FNS-252-FE will help to reduce the burden on program respondents, and as we continue to look for ways to use technology to further reduce the burden.

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 15,986 hours. The number of program respondents is 150,030. The increase in the number of respondents is attributed to program growth; the decrease

of burden hours is attributed to an increase in the number of on-line applications received.

In our initial estimations, an incorrect calculation was made regarding the number of respondents completing form FNS-252-2. We estimated, on average, 904 respondents would complete form FNS-252-2; however, the correct calculation is 894.65 respondents and 173.70 burden hours.

In our initial estimations, the base number used to determine the affected respondents and burden hours for form FNS-252-R was calculated using data as of July 2012, as this was the most current data available to us at the time. Year-end data for FY 2013 is now available and the burden hours have been adjusted to accurately reflect this change.

The following information reflect either a program adjustment or program change, as applicable: The following is an adjustment due to a decrease in applications received and approved by FNS: FNS-252 (3,702.73 previously reported; 628.44 this submission, for an increase of 3,074.73 due to a program adjustment); FNS-252-2 (239.44 previously reported; 173.70 this submission, for a decrease of 65.44 due to a program change); FNS-252-C (638.25 previously reported; 301.35 this submission, for a decrease of 337.25 due to a program adjustment);

The following is an adjustment due to an increase in applications received and approved by FNS: Form FNS-252-E (3,569.65 previously submitted; 4,946.24 this submission which is a decrease of 483.93 due to a program adjustment); FNS-252-R (3,086.34 previously reported; 5,058.46 this submission which is a increase of 1,971.66 due to a program adjustment); eAuthentication (3,569.65 previously reported; 4,054.35 this submission due to a increase of 484.35 due to a program adjustment); Store Visits (427 previously reported; 653.09 this submission which is an increase of 226 due to a program adjustment); and FNS-252-FE (0 previously submitted; 171 this submission which is an increase of 171 due to a program change).

The estimated total annual burden hours associated with this information collection requirement is 15,986.28 hours, rounded to 15,986 hours. This is a decrease of 139.23 hours from the currently approved 16,125.48 hours.

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

Not applicable. 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.**

FNS is not seeking approval to not display the expiration date.

- 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.