

## Large SNAP Goals and Objectives from FNS Statement of Objectives (SOO)

Study Goals	
Overarching Goal: To provide the Agency with a better understanding of the systems <sup>3</sup> that large retailers use to prevent loss in their stores focusing primarily on the prevention of retailer-level SNAP fraud. (SOO, p2)	
Study Goal: The goal is A. to learn more about the kinds of SNAP fraud that occurs in large retailer settings; B. document store practices to detect, deter, and deal with fraud at the store level; and C. determine whether these practices would provide data streams that would be helpful for managing fraud in larger stores (and potentially in all stores). (SOO p9)	
Study Objectives	
1. Describe the ways in which large retailers with stores authorized to redeem SNAP benefits are structured. 1A. What role do parent companies play in the general management of different ‘brands’ within their organizations?	
2. Describe the kinds of SNAP fraud that are prevalent and present challenges for large retailers. (SOO, p10)	
3. Describe the methods large retailers use to prevent, detect, and report the kinds of fraud noted above, fraud in general, and SNAP benefit trafficking in particular. (SOO, p10) 3A Do retailers use the same methods to detect different types of fraud (e.g., credit card fraud) as they do SNAP benefit trafficking? 3B How does training in SNAP fraud prevention fit into a complete loss prevention training strategy? 3C Does surveillance of employees play a role in preventing fraud? 3D What methods do retailers feel work best? 3E In which methods do retailers plan to invest resources in the future?	
4. Describe the division of responsibility for preventing SNAP fraud in large retailers. (SOO, p10)	
5. Describe the role training plays in large retailers’ efforts to prevent SNAP fraud. (SOO, p10) 5A Is FNS mandated training integrated into a bigger loss prevention system? 5B Do large retailers feel that employee training is effective in loss prevention? (SOO, p11) 5C Which employees are the focus of loss prevention training, especially SNAP fraud prevention? 5D What resources are put into employee training?	
6. Describe the analytics used by large retailers to detect various types of fraud in general and SNAP fraud specifically; (SOO, p11) 6A Do the large retailers use their own systems or use contracted firms? 6B What analytic indicators do the large retailers use to detect fraud? 6C Does analytic analysis detect all or most fraud or is further investigation needed?	

<p>7. Describe the role investigator-driven in-store investigations play in finding and detecting fraud in general and SNAP benefit trafficking in particular in large retailers. (SOO, p11)</p> <p>7A Who conducts in-store investigations?</p> <p>7B What resources are needed to conduct in-store investigation?</p> <p>7C What resources are allocated for in-store investigations versus training and analytics?</p> <p>7D What types of fraud do human in-store investigations detect?</p> <p>7E Is there certain training, background, or experience which helps an investigator be successful in their organization?</p>
<p>8. Does the loss-prevention team assist local law enforcement with investigations that transcend the store location? (SOO, p11)</p>
<p>9. Assess which SNAP fraud prevention and detection practices of large retailers could help SNAP manage fraud. (SOO, p11)</p> <p>9A Is there retailer data used by the loss prevention teams that could be used by SNAP in its analytics?</p> <p>9B What practices could be used across all retailer types (e.g. small and large, independent, chains etc.)?</p> <p>9C Do study findings indicate the need for additional/different retailer training or different training recommendations from FNS?</p>

## Appendix B2: Company Survey Item Cross-Reference Matrix

Goal/Objective	Corporate Survey Items (abbreviated)
<p>1. Describe the ways in which large retailers with stores authorized to redeem SNAP benefits are structured.</p> <p>4. Describe the division of responsibility for preventing SNAP fraud in large retailers. (SOO, p10)</p>	<p>1. Please describe how your company is organized/structured?</p> <p>2. Does the company have regional and/or district LP/AP personnel?</p> <p>3. Please estimate how much of the company's LP resources are allocated to:</p> <ul style="list-style-type: none"> <li>Asset protection</li> <li>Training</li> <li>Video Surveillance</li> <li>In-store investigation</li> <li>Analytics</li> <li>Other (Please describe)</li> </ul> <p>4. Do all the company's retail stores have investigators on site?</p> <p>5. Using a scale from 1 to 5, where 1 is "managers have complete autonomy/discretion," and 3 is "corporate policy must be followed without exception," please tell us how much control individual store managers have in the following types of store operations:</p> <ul style="list-style-type: none"> <li>Hiring store employees</li> <li>Training store employees</li> <li>Processing merchandise returns</li> <li>Placement of video surveillance in store</li> <li>Fraud/theft investigations involving employees</li> <li>Fraud/theft investigations involving customers</li> </ul> <p>6. Please tell us which departments/offices of the company have any involvement with SNAP (i.e., training, store SNAP applications, LP/AP, point of sale (POS) systems, transaction processing, etc.) in any way? (Please mark ALL that apply.)</p> <p>7. Is there a single department that coordinates all SNAP activities in the company?</p> <p>7A. What department has the coordinating role?</p> <p>8. How does the company find out about changes in SNAP rules and regulations?</p> <p>17C. Which organizational levels are involved in programming SNAP-permitted foods into the Point of Sale (POS) system?</p>
5D What resources are put into employee	3. Please estimate how much of the company's LP resources are allocated to:

<p>training?</p> <p>7B What resources are needed to conduct in-store investigation?</p> <p>7C What resources are allocated for in-store investigations versus training and analytics?</p>	<p>Asset protection</p> <p>Training</p> <p>Video Surveillance</p> <p>In-store investigation</p> <p>Analytics</p> <p>Other (Please describe)</p>
<p>1A What role do parent companies play in the general management of different ‘brands’ within their organizations?</p>	<p>1. Please describe how your company is organized/structured?</p> <p>5. Using a scale from 1 to 5, where 1 is “managers have complete autonomy/discretion,” and 3 is “corporate policy must be followed without exception,” please tell us how much control individual store managers have in the following types of store operations:</p> <p>Hiring store employees</p> <p>Training store employees</p> <p>Processing merchandise returns</p> <p>Placement of video surveillance in store</p> <p>Fraud/theft investigations involving employees</p> <p>Fraud/theft investigations involving customers</p>
<p>3. Describe the methods large retailers use to prevent, detect, and report the kinds of fraud noted above, fraud in general, and SNAP benefit trafficking in particular. (SOO, p10)</p> <p>9C Do study findings indicate the need for additional/different retailer training or different training recommendations from FNS?</p>	<p>10. Please indicate how training on SNAP rules and regulations is included in the training program for new sales associates/cashiers:</p> <p>11. What methods are used to deliver training to new sales associates/cashiers on SNAP rules and regulations (including violations)?</p> <p>16. Which of the following methods does the company use for hiring/selecting staff involved with SNAP transactions (sales associates/cashiers, customer service staff, managers)?</p>
<p>5. Describe the role training plays in large retailers’ efforts to prevent SNAP fraud. (SOO, p10)</p>	<p>11. What methods are used to deliver training to new sales associates/cashiers on SNAP rules and regulations (including violations)? (Please mark ALL that apply.)</p> <p>12. Does the company’s training program regarding SNAP rules and regulation (including violations) make use of training materials provided by USDA Food and Nutrition Service (FNS)?</p>

	<p><b>If NO:</b> 12A. Please explain to help us understand why the company does not use the USDA/FNS training materials.</p> <p><b>IF YES:</b> 12B. Using a scale from 1 to 5, where 1 is “not useful at all” and 5 is “very useful,” how useful are the training materials provided by USDA FNS are to the company’s SNAP training?</p>
5C Which employees are the focus of loss prevention training, especially SNAP fraud prevention?	9. For which of the following employee groups does the company provide training related to SNAP rules and regulations (including violations)? (Please mark ALL that apply.)
5A Is FNS mandated training integrated into a bigger loss prevention system?	10. Please indicate how training on SNAP rules and regulations is included in the training program for new sales associates/cashiers:
5D What resources are put into employee training?	<p>3. Please estimate how much of the company’s LP resources are allocated to:</p> <ul style="list-style-type: none"> <li>Asset protection</li> <li>Training</li> <li>Video Surveillance</li> <li>In-store investigation</li> <li>Analytics</li> <li>Other (Please describe)</li> </ul> <p>13. Is training on SNAP rules and regulations (including SNAP violations) a one-time program, or do staff periodically receive updated training on SNAP?</p>
5B Do large retailers feel that employee training is effective in loss prevention? (SOO, p11)	<p>13A. Using a scale from 1 to 5, where 1 is “not at all effective” and 5 is “very effective,” how effective are the company’s employee training programs in . . .?</p> <ul style="list-style-type: none"> <li>Limiting shrink/loss prevention?</li> <li>Limiting SNAP violations?</li> </ul>
9A Is there retailer data used by the loss prevention teams that could be used by SNAP in its analytics?	<p>14. What percent of the company’s stores have self-checkout lanes?</p> <p>14A. Which of the following options describe what is typical for customers using a self-checkout to purchase non-barcoded produce items that require counting or weighing?</p> <p>14B. Does the company plan to decrease, maintain, or increase this level of self-checkouts in the future?</p>

<p>3. Describe the methods large retailers use to prevent, detect, and report the kinds of fraud noted above, fraud in general, and SNAP benefit trafficking in particular. (SOO, p10)</p> <p>And</p> <p>3A Do retailers use the same methods to detect different types of fraud (e.g., credit card fraud) as they do SNAP benefit trafficking?</p>	<p>15. Please estimate the percent of the company's stores that use cash management systems.</p> <p>15A. Using a scale from 1 to 5, where 1 is "not at all effective" and 5 is "very effective," how effective is the company's cash management system in:</p> <p style="padding-left: 40px;">Preventing or detecting shrink in the company's stores?</p> <p style="padding-left: 40px;">Preventing or detecting SNAP purchases for non-permitted items in the company's stores?</p> <p style="padding-left: 40px;">Preventing or detecting cash returned for EBT transactions?</p> <p>16. Please estimate the percent of the company's stores that use an inventory management system.</p> <p>16A. Using a scale from 1 to 5, where 1 is "not at all effective" and 5 is "very effective," how effective is the company's inventory management system in:</p> <p style="padding-left: 40px;">Limiting shrink in the company's stores?</p> <p style="padding-left: 40px;">Limiting purchases of non-permitted items in SNAP transactions?</p>
<p>3. Describe the methods large retailers use to prevent, detect, and report the kinds of fraud noted above, fraud in general, and SNAP benefit trafficking in particular. (SOO, p10)</p>	<p>17. Please estimate the percent of the company's stores that use POS systems.</p> <p>17A. Are the company's POS systems integrated with inventory such that sales can be tracked against inventory?</p> <p>17B. Are the company's POS systems programmed to detect permitted foods for purchase with SNAP benefits?</p>
<p>9A. Is there retailer data used by the loss prevention teams that could be used by SNAP in its analytics?</p>	<p>17D. Which of the following types of information are collected by POS and/or cash management systems?</p> <p><i>Basic transaction data:</i></p> <p><input type="checkbox"/> Cashier identifier</p> <p><input type="checkbox"/> Customer identifier or loyalty program number</p> <p><input type="checkbox"/> Register identifier</p> <p><input type="checkbox"/> Time of transaction</p> <p><input type="checkbox"/> Date of transaction</p> <p><i>Transaction type and value:</i></p> <p><input type="checkbox"/> Type of sale (e.g., regular or return)</p> <p><input type="checkbox"/> Type of return credit (cash, credited to original payment tender, store credit, exchange of the same/like item)</p> <p><input type="checkbox"/> Transaction value</p> <p><input type="checkbox"/> Discounts, coupons applied</p> <p><i>Transaction item details:</i></p> <p><input type="checkbox"/> Number of items purchased</p>

	<input type="checkbox"/> Transaction elapsed time <input type="checkbox"/> Transaction details on product pricing <input type="checkbox"/> Transaction details on SNAP-allowed <input type="checkbox"/> Transaction details on product type(s) (grocery, deli, etc.) <i>Tender details:</i> <input type="checkbox"/> Transaction tender type (e.g., cash, check, credit, debit, EBT) <input type="checkbox"/> Number of types of tender used (e.g., multiple credit cards, cash plus debit card, etc.) <input type="checkbox"/> Specific tender identification (e.g., card number, check number) <i>Register attendant actions:</i> <input type="checkbox"/> Indicator of a voided item <input type="checkbox"/> Indicator of a voided transaction <input type="checkbox"/> Indicator of a keyed versus scanned item <input type="checkbox"/> Indicator of item price decrease over-ride <input type="checkbox"/> Indicator of item price increase over-ride <input type="checkbox"/> Indicator of generic stock keeping unit (SKU) or other internal code (for example, “grocery” versus specific product)  17E. How long beyond the transaction date does the company retain data collected by the POS systems?
3D What methods work best? (Work best = most effective)  3A Do retailers use the same methods to detect different types of fraud (e.g., credit card fraud) as they do SNAP benefit trafficking?	17F. Using a scale from 1 to 5, where 1 is “not at all effective” and 5 is “very effective,” how effective is the company’s POS system in: Preventing or detecting shrink in the company’s stores? Assuring that only SNAP-permitted items are purchased with EBT cards? Assuring that cash is not returned in an EBT transaction? [1-5, Not sure?
3. Describe the methods large retailers use to prevent, detect, and report the kinds of fraud noted above, fraud in general, and SNAP benefit trafficking in particular. (SOO, p10)  3C Does surveillance of employees play a role in preventing fraud?	18. Please estimate what percentage of the company’s stores have video surveillance at the checkout 18A. Using a scale from 1 to 5, where 1 is “not at all effective” and 5 is “very effective,” how effective is POS surveillance as a tool in: Limiting shrink or loss in the company’s stores? Limiting misuse of SNAP in the company’s stores?

<p>3D What methods do retailers feel work best? (Work best operationally defined as most effective)</p> <p>3A Do retailers use the same methods to detect different types of fraud (e.g., credit card fraud) as they do SNAP benefit trafficking?</p>	
<p>3. Describe the methods large retailers use to prevent, detect, and report the kinds of fraud noted above, fraud in general, and SNAP benefit trafficking in particular. (SOO, p10)</p> <p>9C Do study findings indicate the need for additional/different retailer training or different training recommendations from FNS?</p>	<p>19. Does the company have a policy for non-receipted returns of food items?</p> <p>19A. For a non-receipted return of a food item, is the company's general policy for employees to first ask what form of payment was used in the purchase? [</p> <p>19B. If the type of payment cannot be confirmed, what is possible? Return is refused Customer is given a like item in exchange Customer is given store credit for the item Customer is given cash for the item Customer is given their preference (like item, store credit, or cash) The manager may use his/her discretion Other (please describe)</p> <p>19C. Does the company's food return policy take into account the price of an item in determining if the return will be accepted on a non-receipted return?</p> <p>19D. At what dollar amount is manager approval required to accept the returned food?</p> <p>20. Does the company have a general policy on customer use of multiple payment cards that applies to food purchases? 20A. What is the company's general policy on customer use of multiple payment cards that applies to food purchases?</p> <p>21. Does the company have a general policy on customer use of multiple EBT card purchases? 21A. What is the company's general policy on customer use of multiple EBT cards as payment?</p>



<p>6. Describe the analytics used by large retailers to detect various types of fraud in general and SNAP fraud specifically; (SOO, p11)</p>	<p>22. Does the company conduct analyses of store-level POS and/or other data to identify possible fraud and theft?</p> <p>22A. What types of transactions are subjected to analyses?</p>
<p>6A Do the large retailers use their own systems or use contracted firms?</p>	<p>22B. Does the company employ in-house statisticians or analysts to conduct analysis on store-level POS data?</p> <p>22C. Which types of software does the company use to analyze data for loss prevention?</p> <p>22D. What is the name of the purchased analytical software and the company that provides it?</p> <p>22E. Does the company contract with vendors to provide analytical services?</p> <p>22F. What vendor or vendors does the company contract with to provide analytical services?</p>
<p>6B What analytic indicators do the large retailers use to detect fraud?</p> <p>3A Do retailers use the same methods to detect different types of fraud (e.g., credit card fraud) as they do SNAP benefit trafficking?</p> <p>9C Do study findings indicate the need for additional/different retailer training or different training recommendations from FNS?</p>	<p>22G. Does the company use the results from analytics to trigger further action or investigation for both SNAP and non-SNAP transactions?</p> <p>22H. Which analytic indicators trigger further action or investigation?</p> <p><i>Register attendant actions:</i></p> <p><input type="checkbox"/> Excessive overrides</p> <p><input type="checkbox"/> Excessive generic codes or SKUs (e.g., “grocery” for a specific item)</p> <p><input type="checkbox"/> Excessive keyed items (instead of scanned items)</p> <p><input type="checkbox"/> Excessive item voids</p> <p><input type="checkbox"/> Excessive transaction voids</p> <p><input type="checkbox"/> Excessive register markdowns</p> <p><input type="checkbox"/> Excessive transaction time</p> <p><input type="checkbox"/> Low transaction volume</p> <p><input type="checkbox"/> Excessive coupon/discount amounts</p> <p><input type="checkbox"/> Other outlier transaction values</p> <p><i>Tender</i></p> <p><input type="checkbox"/> Excessive number of types of tender in a transaction</p> <p><input type="checkbox"/> Excessive number of payment cards in a transaction</p> <p><i>Sales</i></p> <p><input type="checkbox"/> Round number transaction totals</p> <p><i>Cash drawer discrepancies</i></p>

	<input type="checkbox"/> Discrepancies between cash and other forms of tender <input type="checkbox"/> Cash drawer shortages <i>Inventory</i> <input type="checkbox"/> Inventory too high relative to sales <input type="checkbox"/> Inventory too low relative to sales <i>Manager actions</i> <input type="checkbox"/> Excessive manager register logons - <input type="checkbox"/> Excessive manager logons to particular registers <input type="checkbox"/> Excessive manual corrections in system data <i>Self-Checkouts</i> <input type="checkbox"/> Outlier purchases of items without barcodes (e.g., produce) <input type="checkbox"/> Other outlier transactions <i>Returns</i> <input type="checkbox"/> Customers with high non-receipted return volume or dollars <input type="checkbox"/> Customers who buy at one store, but return to other(s)  <i>Other</i> <input type="checkbox"/> Please list any other indicators that are important to the company in controlling fraud and theft, such as specialized geographic analyses, specialized analyses of short-term or part-time employee behaviors, etc.  <hr/> <hr/> <p>24. Has the company performed any analytics specifically related to SNAP purchases in the company's stores?</p> <p>24A. Which of the following topics specifically related to SNAP purchases has the company analyzed?</p> <input type="checkbox"/> Exception analysis on value of SNAP transactions <input type="checkbox"/> Exception analysis on round number SNAP purchases <input type="checkbox"/> Exception analysis on the same item being purchased excessively in a SNAP purchases <input type="checkbox"/> Exception analysis on SNAP purchases at or near EBT card limit <input type="checkbox"/> Exception analysis on store volume of SNAP transactions <input type="checkbox"/> Exception analysis on generic grocery or other codes in SNAP transactions <input type="checkbox"/> Exception analysis on manager overrides in SNAP transactions <input type="checkbox"/> Exception analysis on employee voids in SNAP transactions <input type="checkbox"/> Unauthorized product purchases <input type="checkbox"/> Length of transaction time (difference by EBT tender vs. another tender) <input type="checkbox"/> Returns of SNAP purchases <input type="checkbox"/> Types of products purchased in SNAP transactions <input type="checkbox"/> Use of multiple SNAP EBT cards in a SNAP transaction <input type="checkbox"/> SNAP purchases in self-checkout lanes
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	<input type="checkbox"/> Other (Please describe): _____
6C Does analysis detect all or most fraud or is further investigation needed?  4. Describe the division of responsibility for preventing SNAP fraud in large retailers. (SOO, p10)	22I. In considering the company's analytical findings and exception reports over the last year, on a scale of 1 to 5 where 1 is "never" and 5 is "most often," please describe how often they were resolved in these ways: Issues were forwarded to a supervisor or store manager for review, retraining or disciplinary action Issues were forwarded to an in-store investigator for resolution. Corporate, regional or district LP staff resolved the issues by gathering information via email/phone call Corporate, regional or district LP staff resolved the issues via in-person, on-site investigation. Corporate, regional or district LP staff or store staff brought in law enforcement. Issues were resolved in some other way (Please describe):
3D What methods do retailers feel work best? (Work best operationally defined as most effective)	23. Using a scale from 1 to 5, where 1 is "not at all effective" and 5 is "very effective," how effective are analytics in: Limiting shrink in the company's stores? Limiting misuse of SNAP in the company's stores, regardless of whether the analytics specifically targeted misuse of SNAP?
Describe the kinds of SNAP fraud that are prevalent and present challenges for large retailers. (SOO, p10)  9C Do study findings indicate the need for additional/different retailer training or different training recommendations from FNS?	25. Using a scale from 1 to 5, where 1 is "presents no challenge" and 5 is "presents a significant challenge," how much of a challenge do these types of SNAP fraud or unusual activities pose to the company? SNAP participants purchasing non-food products with SNAP EBT cards SNAP participants getting cash as change for SNAP EBT purchases SNAP participants using multiple EBT cards to pay for a SNAP purchase SNAP participants getting cash or non-SNAP items for SNAP EBT returns Stolen or purchased SNAP EBT cards being used to make purchases in the company's stores  25A. For items above that you identified as presenting little to no challenge (responses 1 or 2), is that because: This type of violation is rarely attempted This type of violation is not detectable Store practices/systems prevent this type of violation Some other reason, please describe:

	<p>25B. IF store practices/systems prevent this type of violation (response 3) what works best in preventing this type of violation?</p> <p>26. Please estimate how many times in the past fiscal year that corporate, regional or district LP/AP staff investigated suspected SNAP/EBT violations?</p> <p>31. Do you have any suggestions for FNS about reducing SNAP fraud in retail settings?</p> <p>31A. Please feel free to add any other thoughts or suggestions:</p> <p>Unnumbered at end of survey: Please indicate your company's willingness to work with FNS investigators if FNS has reason to believe your company could aid in an important SNAP investigation.</p>
8. Does the loss-prevention team assist local law enforcement with investigations that transcend the store location? (SOO, p11)	<p>27. Have corporate or regional/district LP/AP staff ever worked with federal or State partners (law enforcement or non-law enforcement) to investigate SNAP fraud?</p> <p>27A. In what ways has corporate or regional/district LP/AP staff worked with federal or State partners (law enforcement or non-law enforcement) to investigate SNAP fraud?</p> <p>28. Have corporate or regional/district LP/AP staff worked with federal or State partners (law enforcement or non-law enforcement) on large-scale investigations of retail fraud, interstate theft, fraud involving government programs, or other major criminal activities?</p> <p>28A. In what ways have corporate or regional/district LP/AP staff worked with federal or State partners (law enforcement or non-law enforcement) in large-scale investigations?</p> <p>Unnumbered Item at the end of the survey. Please indicate your company's willingness to work with FNS investigators if FNS has reason to believe your company could aid in an important SNAP investigation.</p>
3E In which methods do retailers plan to invest resources in the future?	<p>29. Which, if any, of these risks pose a concern to the company in the near future?</p> <ul style="list-style-type: none"> <li>Credit card fraud</li> <li>Cyber crime</li> <li>Debit card fraud</li> <li>Employee theft</li> <li>Organized crime</li> <li>Return theft</li> <li>Self-checkout theft</li> </ul>

	<p>Shoplifting SNAP fraud Flash mob thefts Armed robbery Active shooter Other (please describe)</p> <p>30. Does the company have plans to increase resources in any of these LP/AP areas?</p> <p>Loss prevention training Surveillance In-store investigation Analytics/exception reporting Liaison with law enforcement Product protection Other (please describe)</p>
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## B3: Store Survey Item Cross-Reference Matrix

<i>FNS Goals and Objectives</i>	Store Survey Items (Abbreviated)
Describe the kinds of SNAP fraud that are prevalent and present challenges for large retailers. (SOO, p10)	<p>1. In this store does a SNAP EBT purchase takes less time, about the same amount of time, or more time to complete than a purchase made with another form of payment?</p> <p>1A. Do any of these situations cause SNAP transactions to take more time?</p> <p>Some SNAP participants try to purchase non-permitted items</p> <p>Some SNAP participants ask for cash</p> <p>Some SNAP participants try to use expired cards</p> <p>Some SNAP participants try to use an SNAP EBT card with insufficient funds</p> <p>Some SNAP participants do not know their PIN</p> <p>Some SNAP participants need to use multiple payment methods</p> <p>Electronic approval of SNAP EBT transaction processing is sometimes slower or less reliable than other forms of tender</p> <p>Other, specify:</p> <p>2. Approximately what percentage of this store's total sales are accounted for by SNAP purchases?</p>
<p>Study Goal B. document store practices to detect, deter, and deal with fraud at the store level</p> <p>3. Describe the methods large retailers use to prevent, detect, and report the kinds of fraud noted above, fraud in general, and SNAP benefit trafficking in particular. (SOO, p10)</p> <p>9C Do study findings indicate the need for additional/different retailer training or different training</p>	<p>3. Is it store policy to allow any food items for return when purchased with SNAP EBT?</p> <p>4. If a customer requests to return food item(s) without a receipt, does your store use any of the following methods to identify whether the purchase was made with SNAP?</p> <p><input type="checkbox"/> Not applicable—returns are not allowed without a receipt</p> <p><input type="checkbox"/> Ask the customer the method of payment</p> <p><input type="checkbox"/> Ask the customer for the payment card used to make the purchase</p> <p><input type="checkbox"/> Ask the customer to provide identification with name and address</p> <p><input type="checkbox"/> Ask the customer for the approximate date of purchase</p> <p><input type="checkbox"/> Use customer payment method to look up/verify the transaction in the company's systems</p> <p><input type="checkbox"/> Use customer name and address to look up/verify the transaction in the company's systems</p> <p><input type="checkbox"/> Use customer loyalty information to look up/verify the transaction in the company's systems</p> <p><input type="checkbox"/> Use the date of purchase to look up/verify the transaction in the company's system</p>

recommendations from FNS?	<input type="checkbox"/> Review surveillance videos to confirm the purchase was made at the store  5. If your store determines that a non-receipted food item was purchased with SNAP, which of the following are possible? <input type="checkbox"/> Return is refused <input type="checkbox"/> Customer is given a like item in exchange <input type="checkbox"/> Return is credited to EBT card if the customer has a valid EBT card <input type="checkbox"/> Customer is given store credit for the item <input type="checkbox"/> Customer is given cash for the item <input type="checkbox"/> Customer is given their preference (like item, store credit, or cash)  6. Does the store have a policy about a customer using three or more SNAP EBT cards in a transaction?  6A. What is the policy?  7. Please estimate the percent of this store's SNAP sales that are made at self-checkouts.  7A. Can multiple EBT cards be used at self-checkout lanes?
Study Goal B. document store practices to detect, deter, and deal with fraud at the store level  3. Describe the methods large retailers use to prevent, detect, and report the kinds of fraud noted above, fraud in general, and SNAP benefit trafficking in particular. (SOO, p10)	8. Which of the following security measures are used in this store? Electronic Article Surveillance (EAS) Closed circuit television (CCTV) Uniformed guards Undercover LP agents Signs/special signage Public-view monitors (PVM) Other (describe)
3A Do retailers use the same methods to detect different types of fraud (e.g., credit card fraud) as they do SNAP benefit trafficking?	8A. Using a scale from 1 to 5, where 1 is "not effective at all" and 5 is "very effective," please answer the following questions. How effective are this store's security measures in limiting shrink? How effective are this store's security measures in limiting misuse of SNAP benefits?
Study Goal B.	9. Does this store have a POS system?

<p>document store practices to detect, deter, and deal with fraud at the store level</p> <p>3. Describe the methods large retailers use to prevent, detect, and report the kinds of fraud noted above, fraud in general, and SNAP benefit trafficking in particular. (SOO, p10)</p> <p>9C Do study findings indicate the need for additional/different retailer training or different training recommendations from FNS?</p>	<p>9A. Can inventory for this store be monitored through the POS or other systems?</p> <p>9B. Is the POS system programmed to detect permitted products for purchase with SNAP benefits?</p> <p>9C. Does the POS system lock the cash drawer during a SNAP EBT transaction?</p> <p>9D. Does the POS system require manager approval of a void?</p> <p>9E. Does the POS system require manager approval of use of a generic SKU (e.g., "grocery" instead of specific item)?</p> <p>9F. Does the POS system require a manager approval of an override?</p> <p>9G. Does the POS and timecard system require identification of cashiers that is more definitive than a password, such as facial recognition, verification of identity with a government-issued picture identification card, or verification with a company-issued picture identification card?</p> <p>9H. Does the POS have automatic logout for inactivity?</p> <p>9I. Does the POS or other systems record transaction revenues by form of tender?</p>
<p>3A Do retailers use the same methods to detect different types of fraud (e.g., credit card fraud) as they do SNAP benefit trafficking?</p>	<p>9K. Using a scale from 1 to 5, where 1 is "not effective at all" and 5 is "very effective," please answer the following questions. How effective is this store's POS in limiting shrink? How effective is this store's POS in limiting misuse of SNAP benefits?</p>
<p>9A Is there retailer data used by the loss prevention teams that could be used by SNAP in its analytics?</p>	<p>9J. How long is transaction data retained by or for this store (for possible access in a future investigation)?</p>
<p>Study Goal B. document store practices to detect, deter, and deal with fraud at the store level</p> <p>3. Describe the methods large retailers</p>	<p>10. Is video surveillance used at checkouts? IF YES: 10A. Does video surveillance monitor the front-end checkout area as a whole, individual check-out lanes, or both? 10B. Does video surveillance capture images of the register attendants, customers, or both?</p>



<p>use to prevent, detect, and report the kinds of fraud noted above, fraud in general, and SNAP benefit trafficking in particular. (SOO, p10)</p> <p>3C Does surveillance of employees play a role in preventing fraud?</p>	
<p>9A Is there retailer data used by the loss prevention teams that could be used by SNAP in its analytics?</p>	<p>10C. Is video surveillance at the checkout monitored in real time, recorded for later review, or both?</p> <p>10D. How long is video surveillance data retained by or for this store?</p> <p>10E. Does POS video surveillance data link electronically to individual transactions in the POS?</p>
<p>3A Do retailers use the same methods to detect different types of fraud (e.g., credit card fraud) as they do SNAP benefit trafficking?</p> <p>3C Does surveillance of employees play a role in preventing fraud?</p>	<p>10F. Using a scale from 1 to 5, where 1 is "not effective at all" and 5 is "very effective," please answer the following questions.</p> <p>How effective is this store's video surveillance system in limiting shrink?</p> <p>How effective is this store's POS in limiting misuse of SNAP benefits?</p>
<p>3. Describe the methods large retailers use to prevent, detect, and report the kinds of fraud noted above, fraud in general, and SNAP benefit trafficking in particular. (SOO, p10)</p>	<p>11. Using a scale from 1 to 5, where 1 is "not a problem at all" and 5 is "a significant problem," how problematic are the following issues for this store?</p> <p>Coupon fraud</p> <p>Employee theft</p> <p>Shoplifting</p> <p>Return fraud</p> <p>SNAP fraud</p> <p>Violent crime</p> <p>Bookkeeping/Processing errors</p> <p>12. Please indicate at what times of day, if any, loss and theft issues are more problematic in this store.</p> <p>13. If employee fraud or theft is suspected, what corporate</p>

	<p>department is notified?</p> <p>14. In the past year, has the manager or a relevant supervisor of this store been notified by corporate or observed any of these situations involving cashiers/associates in this store?</p> <ul style="list-style-type: none"> <li>Excessive overrides</li> <li>Excessive use of generic SKUs (e.g., “grocery” instead of a specific item)</li> <li>Excessive use of voids</li> <li>Excessive use of register markdowns</li> <li>Round number sales</li> <li>Discrepancies between cash and other forms of tender</li> <li>Cash reconciliation issues</li> <li>Slow transaction time</li> <li>High return volume</li> <li>High return dollars</li> </ul> <p>14A. Considering these situations over the last year, on a scale of 1 to 5 where 1 is “not at all often” and 5 is “Always,” please describe how often these situations were resolved in these ways.</p> <ul style="list-style-type: none"> <li>Disciplining the employee</li> <li>Re-training the employee</li> <li>Closer monitoring of employee performance</li> <li>Follow-up by in-store investigator</li> <li>Investigation involving corporate LP/AP</li> <li>Termination of an employee</li> </ul>
<p>Study Goal B. document store practices to detect, deter, and deal with fraud at the store level</p> <p>7. Describe the role investigator-driven in-store investigations play in finding and detecting fraud in general and SNAP benefit trafficking in particular in large retailers. (SOO, p11) 7A Who conducts in-store investigations? 7D What types of fraud do human in-store</p>	<p>15. In the past 12 months, how many times has this store used an investigator to look into a concern about fraud or theft in this store?</p> <p>15A. Using a scale from 1 to 5, where 1 is "not important at all" and 5 is "very important, please rate the importance of in-store investigation in protecting this store from fraud and theft.</p> <p>15B. In this store, what types of issues necessitate involvement of an in-store investigator?</p> <ul style="list-style-type: none"> <li>Suspected shoplifting</li> <li>Suspected employee theft of inventory</li> <li>Suspected employee theft at point-of-sale</li> <li>Suspected employee theft through bookkeeping, data systems</li> <li>Suspected SNAP fraud</li> <li>Resolution of exception reports</li> <li>Customer slips, falls, other injuries</li> <li>Developing evidence for legal action</li> <li>Vandalism, product damage</li> <li>Other (please describe)</li> </ul>

<p>investigations detect? 7E Is there certain training, background, or experience which helps an investigator be successful in their organization?</p>	<p>15C. From the following list of skills, experiences and background, which are the three most important for an effective in-store investigator?</p> <ul style="list-style-type: none"> <li>Prior military service</li> <li>Prior law enforcement experience</li> <li>A college education</li> <li>Prior retail investigative experience</li> <li>Prior experience in this store</li> <li>Personal characteristics such as inquisitiveness, persistence, attention to detail</li> <li>Analytical and logic skills</li> <li>Investigative skills, such as observation, thoroughness and objectivity</li> <li>Intuitive skills/gut reaction</li> <li>Ability to document and communicate findings and conclusions</li> <li>Common sense and good judgement</li> </ul>
<p>8. Does the loss-prevention team assist local law enforcement with investigations that transcend the store location? (SOO, p11)</p>	<p>16. Has this store ever worked with federal or State partners (law enforcement or non-law enforcement) to investigate SNAP fraud in this store?</p> <p>16A. In what ways has this store worked with federal or State partners to investigate SNAP fraud?</p>
<p>Describe the kinds of SNAP fraud that are prevalent and present challenges for large retailers. (SOO, p10)</p> <p>9C Do study findings indicate the need for additional/different retailer training or different training recommendations from FNS?</p>	<p>17. Using a scale from 1 to 5, where 1 is "presents no challenge" and 5 is "presents a significant challenge," how much of a challenge do these types of SNAP violations pose to this store?</p> <ul style="list-style-type: none"> <li>SNAP participants attempting to purchase non-SNAP products with SNAP EBT cards</li> <li>SNAP participants asking for cash as change for SNAP EBT purchases</li> <li>SNAP participants asking for cash or non-SNAP items for SNAP EBT returns</li> <li>Stolen or purchased SNAP EBT cards being used in this store</li> </ul> <p>17A. For items above that you identified as presenting little to no challenge, is that because:</p> <ul style="list-style-type: none"> <li>This type of violation is rarely attempted</li> <li>This type of violation is not detectable</li> <li>Store practices/systems prevent this type of violation</li> <li>Some other reason, please describe</li> </ul> <p>IF systems prevent this type of violation:</p> <p>17B What works best in preventing this type of violation?</p>

<p>1. Describe the ways in which large retailers with stores authorized to redeem SNAP benefits are structured.</p> <p>3. Describe the methods large retailers use to prevent, detect, and report the kinds of fraud noted above, fraud in general, and SNAP benefit trafficking in particular. (SOO, p10)</p>	<p>18. If a SNAP violation or fraud issue is suspected in this store, how and to what organization is this reported?</p> <p>19. In the past 12 months, has this store reported a SNAP violation or fraud issue to corporate?</p>
<p>Describe the kinds of SNAP fraud that are prevalent and present challenges for large retailers. (SOO, p10)</p>	<p>28. In the past 12 months, has this store reported a SNAP violation or fraud issue to corporate?</p>
<p>3E In which methods do retailers plan to invest resources in the future?</p>	<p>29. Which, if any, of these issues pose a concern to this store in the near future?</p> <ul style="list-style-type: none"> <li>Coupon fraud</li> <li>Credit card fraud</li> <li>Debit card fraud</li> <li>Employee theft</li> <li>Organized crime</li> <li>Return fraud</li> <li>Self-Checkout theft</li> <li>Shoplifting</li> <li>SNAP fraud</li> <li>Flash mob thefts</li> <li>Armed robbery</li> <li>Active shooter</li> <li>Other (please describe)</li> </ul> <p>20A. Are there plans for this store to increase resources for any of these loss prevention methods?</p> <ul style="list-style-type: none"> <li>Loss prevention training</li> <li>Video surveillance</li> <li>In-store investigation</li> <li>Analytics/exception reporting</li> <li>Liaison with law enforcement</li> <li>Product protection</li> <li>Other, please describe</li> </ul>

<p>3. Describe the methods large retailers use to prevent, detect, and report the kinds of fraud noted above, fraud in general, and SNAP benefit trafficking in particular. (SOO, p10)</p>	<p>21. Please indicate which methods are used in this store for hiring/selecting staff who have cash register access?</p> <p>Reference checks  Prior related experience  Criminal background checks  Criminal background checks  Internet/social media checks  In-person interviews  Job-skill assessments (e.g., use of electronic registers, processing payments)  Other, please describe</p>
<p>5A Is FNS mandated training integrated into a bigger loss prevention system?</p> <p>5B Do large retailers feel that employee training is effective in loss prevention? (SOO, p11)</p> <p>5C Which employees are the focus of loss prevention training, especially SNAP fraud prevention?</p> <p>5D What resources are put into employee training?</p> <p>3B How does training in SNAP fraud prevention fit into a complete loss prevention training strategy?</p> <p>9C Do study findings indicate the need for additional/different retailer training or different training recommendations from FNS?</p>	<p>22. How long does it take a new employee to complete training on SNAP requirements (including violations)?</p> <p>23. How often do staff who operate registers receive updated or on-going training related to SNAP rules and regulations (including violations)?</p> <p>24. Using a scale from 1 to 5, where 1 is “not at all effective” and 5 is “very effective,” how effective is SNAP training in communicating to staff about SNAP rules and regulations (including violations)?</p> <p>25. In the past year, did you receive any training on SNAP rules and regulations (including violations)?</p> <p>IF NO:</p> <p>25A. In what year did you last receive any training on SNAP rules and regulations (including violations)?</p>

<p>3. Describe the methods large retailers use to prevent, detect, and report the kinds of fraud noted above, fraud in general, and SNAP benefit trafficking in particular. (SOO, p10)</p>	<p>27. On average, how many years has a full-time employee in this store been with the company (include prior company if an acquisition)?</p> <p>28. On average, how many years has a part-time employee in this store been with the company (include prior company if an acquisition)?</p> <p>29. In the past year how many employees have been terminated from this store for suspected or proven theft or fraudulent activities?</p> <p>30. In the past year have you disciplined or terminated an employee for suspected or proven fraudulent activities related to SNAP or EBT cards in this store?</p> <p>31. Does this store have a hotline (or similar means) for employees to report concerns, awareness of employee theft, and similar issues?</p>
<p>3. Describe the methods large retailers use to prevent, detect, and report the kinds of fraud noted above, fraud in general, and SNAP benefit trafficking in particular. (SOO, p10)</p>	<p>32. How many years have you worked in retail?</p> <p>33. How many years have you worked in retail at the management level?</p> <p>34. How many years have you been working for your current employer (include time with former company in acquisition situation)?</p>