

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM

STORE APPLICATIONS - OMB NUMBER 0584-0008 - FORMS FNS-252, FNS-252-E,

FNS-252-FE, FNS-252-R, FNS-252-2; and FNS-252-C

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Background

A final rule codifying these requirements, titled “Enhancing Retailer Standards in the Supplemental Nutrition Assistance Program (SNAP) (referred to as the Retailer Enhancement Rule)”, RIN #0584-AE27, was published in the Federal Register on December 15, 2016 (81 FR 90675). The rule became effective January 17, 2017 with rolling implementation dates. A General Provision in the 2017 Omnibus Appropriations Act required the Department to not implement the variety requirements of this regulation until certain modifications were made. Until then, the Department must revert to the variety requirements that were in place prior to the 2014 Farm Bill. As a result, FNS has modified the application question pertaining to variety such that it will fit with the current or any future variety definitions without having to make additional application changes.

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 information collection request. The need to collect information is established 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.

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-FE, FNS-252-C, 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 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 requirements of the E-Government Act of 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.

FNS offers an online application as an option for retailers who wish to complete and submit authorization and reauthorization via the Internet on the FNS website. The online application allows users to enter data and text; and allows the respondent the flexibility to start the application and return within 30-days to complete and submit it electronically to FNS.

FNS utilized technology advancements and the required documents can now be uploaded when respondents submit an online application. The upload functionality simplifies and reduces the burden for respondents. Applicants who are unable to submit documents electronically, or who prefer not to use this feature have the option to mail documents to FNS. Additionally, applicants submitting an online application can also check the status of their application in real-time via the FNS website at <https://www.fns.usda.gov/snap>. Approximately 88 percent of retailers submit applications online.

Firms designated by FNS due for reauthorization are also encouraged to complete the online reauthorization application, form FNS-252-R in lieu of completing and mailing a paper application to FNS. The number of questions asked on form FNS-252-R is limited to those 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 thereby decreasing the time it take to complete this form. Retailers are only required to select a “No” response if the filtered information FNS has on file is no longer correct.

- 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. 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.

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

The 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 information via the Internet on the FNS web site at <https://www.fns.usda.gov/snap>. One of the enhanced features of completing the online application is that several data fields will be auto-populated based on information FNS has on file in STARS and supporting documentation can be uploaded at the time of submission to FNS. This minimizes the administrative burden placed on all firms by applying for continued participation in SNAP, including small businesses. FNS estimates that 86 percent of respondents 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.

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 requests 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 February 16, 2017, Volume 82, pages 10871 – 10873. FNS received four comments from the public in response to this Notice. Of the four comments FNS received, two are not germane to the information collection. The third commenter requested copies of the revised application forms referenced in the Information Collection. FNS' response stated we do not have the revisions completed at this time for the public to view. We anticipate having the revisions completed in April 2017. FNS provided a link to the Retailer Enhancement Rule on the FNS website for more information. The fourth commenter was a law firm representing the National Association of Convenience Stores (NACS) and Society of Independent Gasoline Marketers of America (SIGMA). The commenter stated the proposed collection of financial and marketing data is unnecessary and creates an additional burden to SNAP retailers. The commenter said: (a) FNS should not collect financial information where SNAP deposits will be made because this is sensitive information and should not be provided unless the Agency can guarantee it will not be

shared or stolen. Providing this information creates a risk for the Agency and SNAP retailers; (b) FNS should not collect data relating to a store's business practices, including whether a store offers incentives or discounts to SNAP recipients. This is a marketing and business decision that should be protected as confidential business information and should be protected under the Freedom of Information Act (FOIA); and (c) collecting unnecessary sensitive information will make it more burdensome for retailers to apply to participate in SNAP.

Response:

(a) FNS has carefully considered the comments from the commenter. Collection of financial institution information currently occurs at the SNAP point-of-sale service provider level for settlement purposes. FNS already collects information regarding the bank of record from retailers with adverse Program history or those operating locations that have violated SNAP rules. In order to assist in troubleshooting settlement issues and because this information is a component of SNAP integrity, FNS is reinstating collection of this data more broadly. The commenter suggested this data not be collected unless the Agency can guarantee it will not be shared or stolen. The commenter also stated the providing of this information creates a risk to the Agency and SNAP retailers. FNS considered the concerns of the commenter regarding the privacy and safeguarding of information provided on the SNAP retailer application. The Agency makes every attempt to reasonably ensure the information collected and data stored on its servers are protected from theft and hackers. FNS

certifies that the information collection complies with the Privacy Act of 1974. No change to the collection of information will be made.

- (b) The commenter stated it is inappropriate for FNS to collect data relating to a store's business practices, including whether a store offers incentives or discounts to SNAP recipient, which may not be protected under FOIA and releasing such business information to the public places the stores at a competitive disadvantage. The revisions to the SNAP retailer applications were not finalized at the time the 60-day notice was published in the Federal Register. FNS is not adding this question to the collection of information and therefore this comment is moot.
- (c) The commenter stated the proposed collection of sensitive financial and marketing data will increase the burden for SNAP retailers; the burden estimate is inaccurate; and the collection of such information is unnecessary for the advancement of the Program. Prior to receiving this comment, FNS determined an incorrect calculation was used in our initial estimation of burden hours. FNS increased the burden hours for this information collection from 1 to 11 minutes, on average, per respondent, to 1 to 19 minutes, per respondent. The bulk of the additional burden is related to asking questions in light of the regulatory changes to SNAP retailer eligibility requirements. As previously stated, FNS has removed the question regarding incentives from its final application forms. The Agency believes that the minor additional burden associated with collecting bank name and addresses are outweighed by the benefits to program integrity. In addition, adding this information to the application form and associated electronic application will do away with the need for FNS to separately

reach out to retailers and collect this same information through mail as we do today; thereby streamlining the data collection process for the retailer community.

Since our last submission to OMB, FNS sought early stakeholder engagement through a series of collaborative conversations and discussions with our external partners, such as the National Grocers Association (NGA) and the Independent Grocers Alliance (IGA), and a standing advisory group of regional, field and headquarter staff to discuss programmatic changes as a result of the enacted legislation regarding the Retailer Enhancement Rule to form FNS-252 and FNS-252-C. FNS met with NGA in March, 2016 and April, 2017, and IGA in September, 2016. Such conversations included, among other things, retailers stating FNS' procedures for submitting information requested on form FNS-252 and FNS-252-C do not adequately address their business process and procedures; complained about the lack of a customer friendly system for non-Centrally Administered Chain (CAC) designated chains; the amount of time to submit multiple pieces of information to FNS; and the amount of time it took to become authorized. As a result of user feedback during these meetings, FNS is revising form FNS-252-C.

In FY 2016, we identified approximately 115 MSOs that had one or more stores due for reauthorization. The owners of these stores were contacted to introduce a streamlined process that would allow them to work with FNS staff to complete form FNS-252 and FNS-252-C's for all of their stores in bulk and allow them to submit one set of owner documents and general corporation documents at one time. To date, staff has made successful contact with 75 MSOs. Of the 75 contacts, 74 MSOs, or 99% wanted to

participate in the streamlined service. FNS staff is continuing to contact the remaining firms for FY 2016 and will continue this process in FY 2017.

In March 2016, FNS sent information for a press release to the NGA; and in September 2016 FNS meet with the members of IGA regarding our enhancements made to the multi-store process and our findings regarding our FY 2016 streamlining efforts.

9. Explain any decision to provide any payment or gift to respondents, other than re-enumeration of contractors or grantees.

No payment or gift will be provided to respondents.

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 request personal identifying information (information regarding owners and officers: Name, home address, Social Security Number (SSN), and date of birth (DOB) on retail and wholesale store owners and officers, and/or owners and officers associated with other entities. The SSNs are collected only from owners of sole proprietorships and partnerships, and officers, principal shareholders, and members of private corporations, limited liability companies, cooperatives, and non-profit organizations, and are stored in an encrypted format in the STARS database.

Owner personal 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.-

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.

This information is safeguarded at the Retailer Service Center in Falls Church, Virginia, 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.

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.

- 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.

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 19,381 hours (14,054 hours for the application forms + 4,623 for e-Authentication + 704 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.

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, military commissaries, and meal services. The number of respondents is 132,599 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. 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 19,381 hours (14,054 hours for the application forms + 4,623 for E-Authentication + 704 hours for the FNS Store Visit).

The description of the reporting burden for SNAP Retailer Application forms are contained in the Burden Narrative. There are no recordkeeping burden estimates for this data collection.

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

Affected Public	Respondent Type	(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)	Previous Submission Total hours	Difference Due to Program Changes	Difference Due to Program Adjustments
Reporting											
Farms, Business for not for profit	SNAP Retailer, Farmers' Market, and Meal Service	Applications Received	252	1,438	1	1,438	0.3167	455.41	628.00		(172.59)
		Applications Received	252-E	32,799	1	32,799	0.25	8,199.75	4,946.00		3,253.75
		E-Authentication	252-E and FNS-252-FE	34,601	1	34,601	0.1336	4,622.69	4,054.00		568.69
		Applications Received	252-FE	1,802	1	1,802	0.25	450.50	171.00		279.50
		Applications Received	252-2	379	1	379	0.25	94.75	174.00		(79.25)
		Applications Received	252-C	4,770	1	4,770	0.25	1,192.50	301.00		891.50
		Store Visits		42,165	1	42,165	0.0167	704.16	653.00		51.16
		Reauthorization	252-R	14,638	1	14,638	0.25	3,659.50	5,058.00		(1,398.50)
Sub-Total For Farm & Business				132,592	1	132,592	0.1461571	19,379.26	15,985.00		3,394.26
Federal	Military Commissaries	Applications Received	252	4	1	4	0.3167	1.27	0.75		0.52
		Reauthorization	252-R	3	1	3	0.25	0.75	1		-0.25
Sub-Total For Federal Respondents				7	1	7	0.2857	2	2	0	0.27
Grand Total Reporting Burden				132,599	1	132,599	0.1461646	19,381	15,986.75		3,394.53
SUMMARY OF BURDEN FOR THIS COLLECTION				132,599	1	132,599	0.146165	19,381	19,381.28		3,394.53

*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 2016 Bureau of Labor Statistics (BLS) hourly mean wage for grocery store general and operations manager, found at <https://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 \$1,137,664.70 (General and Operations Manager wage @ \$58.70 per hour x 19,381 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 \$1,305,484.30. This cost includes staffing support costs of \$22,984.32 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 440 hours for the writer at a General Schedule (GS) wage of a GS 13 Step 4 and 16 hours for the Branch Chief at a GS 14 Step 6 wage based on the 2017 Washington DC-Northern Virginia locality area hourly rate of \$49.96 and \$62.62, respectively, and \$2,000 in Federal cost for contractor support for revisions to forms FNS-252, 252-2, 252-C and 252-R; and approximately \$1,275,000 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 \$2,218,585.60. This includes; staffing support costs of \$144,361.62 (based on the 2017 Washington DC-Northern Virginia locality area hourly rate of a GS12, Step 10 wage of \$49.66 per hour x 2,907 hours (19,381 burden hours x 15%)) for evaluation and processing of an estimated 24,499.50 retailer applications (132,599 respondents – 34,601 eAuthentication = 97,998 respondents x 0.25), and review of annual documentation from reports and store visits]; printing costs of \$6,290; assembly and mailing costs of \$100,653; and \$1,967,281 for the Retail Service Center Contract. FNS eliminated

shipping and storage costs by printing the initial application and reauthorization application on demand from our Retailer Service Center in Falls Church, Virginia.

FNS pays approximately \$85.85, 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 2016, FNS spent approximately \$3.1 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 15,986. Due to adjustments, the estimated annual burden is 19,381, an increase of 3,395.53 hours rounded to 3,395 hours. There are program changes and those didn't impact the burden estimates. The estimated total number of annual responses decreased. The current total number of responses is 150,030; FNS is seeking 132,599 as an estimated total annual responses. This revision reflects a decrease of 17,431 total annual responses. An explanation of program changes and adjustment follows:

Program Changes:

The revisions to forms FNS-252; FNS-252-E; FNS-252-FE; FNS-252-R; FNS-252-2; and FNS-252-C are necessary as a result of regulatory changes to regulatory changes codified by the Retailer Enhancement Rule, and amended by the 2014 Farm Bill.

FNS is amending all SNAP applications forms, where applicable to (1) re-word and/or clarify questions and instructions, and examples by making design and formatting changes to the paper and online application and help screens; (2) add nine new questions; and (3) revise the content on form FNS-252-R to be consistent with information found on the FNS-252.

FNS is also revising form FNS-252-C and includes Multi-Store Owners (MSOs) in the group of respondents that will complete form FNS-252-C. The Program defines MSOs as owners of entities that own 10 or more eligible retail food stores. Form FNS-252-C was developed as an addendum to the retailer application form, FNS-252, for corporations to use to submit information to FNS that is unique to each store under the corporation. Currently, a corporation or an MSO completes only one retailer application that is universal to all of the chain stores on form FNS-252 for initial SNAP authorization, and submits updates on the addendum, form FNS-252-C. The addendum does not collect any new types of information other than those collected on the FNS-252.

Adjustments:

In our initial estimations, an incorrect calculation was made regarding the number of respondents and the burden hours. Initially, we incorrectly calculated the number of respondents and the estimated burden hours per response. In our previous submission we

incorrectly estimated, on average, 127,597 respondents and the burden hours to be 13,978; however, the correct calculation is 132,599 respondents and 19,381 burden hours.

The following information reflect with an adjustment or program change, as applicable:

The following is an adjustment due to an increase in applications received and approved by FNS: FNS-252 (1,240 previously reported; 1,442 this submission, which is a increase of 202 due to an adjustment); FNS-252-E (31,919 previously reported; 32,799 this submission, which is a increase of 880 due to an adjustment); e Authentication (33,399 previously reported; 34,601 this submission, which is an increase of 1,202 due to an adjustment); FNS-252-FE (1,480 previously reported; 1,802 this submission, which is an increase of 322 due to an adjustment); FNS-252-2 (372 previously reported; 379 this submission, which is an increase of 7 due to an adjustment); FNS-252-C (4,594 previously reported; 4,770 this submission, which is an increase of 176 due to an adjustment); Store Visits (40,522 previously reported; 42,165 this submission, which is an increase of 1,643 due to an adjustment); and FNS-252-R (14,071 previously reported; 14,641 this submission which is an increase of 570 due to an adjustment).

The changes are also due to adjustments in which FNS didn't clearly identify Federal Commissaries as an affected public, we are now clarifying this in the narrative and have delineated our estimates in the Table A. 12.1. These figures are based on historical numbers of applications and reauthorization's received by FNS.

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.