



Food and
Nutrition
Service

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Date: December 27, 2017

From: Andrea Gold, Director, Retailer Policy & Management Division, Food and Nutrition Service (FNS), Supplemental Nutrition Assistance Program (SNAP)

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To: Steph Tatham, OMB/OIRA Desk Officer

FNS is issuing this memo in response to OMB's concern around requesting financial institution name and mailing address from applicant and authorized SNAP retailers. Until the early 2000's, FNS collected the bank name, address, and telephone number for each store that applied for SNAP authorization. When EBT implementation was complete in 2004, FNS stopped collecting this information. As a part of the EBT process, retailers were providing bank information to the State EBT Processors for settlement purposes and FNS considered that collection sufficient.

There is a strong law enforcement interest in getting financial institution information to track settlement of funds. In particular, many Office of Inspector General criminal investigations require settlement tracking to determine whether wire-fraud charges are warranted.

For a number of years, the vast majority of retailers used no-cost EBT only equipment that was provided by the State EBT Processors. Therefore, getting settlement information for the transactions that took place at a retailer's location was relatively straight-forward. In most instances, the State's EBT processor was able to provide that information.

In 2014, retailers became responsible for providing their own equipment and EBT services. Approximately 110,000 retailers moved away from State EBT Processor provided point-of-sale equipment and services to point-of-sale equipment and services provided by independent sales organizations (ISO) and third party processors (TPP). Getting settlement information in this construct is much more challenging as often the ISO or TPP is unknown.

With approval of this collection, FNS will only collect the financial institution name and mailing address once for any owner with 10 or more SNAP authorized locations. We are not seeking to collect bank account numbers. This multi-store owner group constitutes over

116,000 of the 260,000 SNAP authorized stores. For the remaining single store owners, the financial institution name and mailing address will be collected as a part of the SNAP authorization and reauthorization process.