

**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**

The Agricultural Act of 2014 (2014 Farm Bill) amended the Food and Nutrition Act of 2008 (the Act) and the Supplemental Nutrition Assistance Program (SNAP) revised all retailer application forms (paper and electronic) in January, 2018, as a result of regulatory changes required by the Act and amended by the 2014 Farm Bill. Such changes to the Act amended the definition of “retail food store” to clarify when a retailer is a restaurant rather than a retail food store. Among the changes made to the SNAP retailer application form(s), the Food and Nutrition Service (FNS) added a new question, Question 18, concerning restaurant licensing, and revised Question 22, regarding total retail sales on Form FNS-252.

Due to concern with the manner in which FNS is currently asking for retailer sales data, FNS is updating the retailer application question regarding sales. FNS is also removing the question concerning restaurant licensing and the requirement for businesses located in community

property states to provide spousal information for each owner. FNS is also adding a new sentence to the Certification and Signature Statement to clarify that each owner is required to sign and submit their own Certification and Signature Statement.

### **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 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.

Other required documents can 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 81 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, Military Commissaries 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 consequence to the Federal program is the Agency's reduced ability to effectively monitor accountability for program compliance and to detect fraud and abuse.

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 August 17, 2018, Volume 83, pages 41043 – 41045. FNS received nine comments from the public in response to this Notice. Of the nine comments FNS received, two comments (commenters #1 and 6) are not germane to this information collection. Commenter #1 proposed a revision to Question 7F on Form FNS-252-FE which is both out of scope for this revision and would require a regulatory change. Commenter #6 submitted an anonymous comment concerning a matter outside of USDA’s purview and is unrelated to SNAP. Of the remaining seven commenters, five commenters are from convenience stores (commenters #2, 4, 5, 8, and 9); one commenter (commenter #3) was a law firm representing the National Association of Convenience Stores (NACS) and Society of Independent Gasoline Marketers of America (SIGMA); and one commenter (commenter #7) was a firm which provides processing services to new and existing SNAP retailers.

The majority of comments were regarding Question 18, Staple Food Varieties and Question 21, Total Retail Sales. FNS received five similar comments to Question 18 regarding FNS’ request for the precise number of staple food varieties. Six comments were received regarding FNS’ request for total retail sales percentages concerning gasoline and cold foods prepared on-site in Question 21. Commenter #7 had concerns regarding: (a) the estimated burden for this collection; (b) the request for clarity on questions related to breadth and depth of stock requirements; and (c) FNS’ request for total retail sales percentage for each category of product sales.

Response:

Commenter #1: FNS did not propose a change to Question 7F on Form FNS 252-FE, and FNS is not adopting this change in this information collection. The change is outside the scope for this revision; and would require a regulatory change.

Commenter #6: The comment was submitted anonymously and is in regards to climate change. This matter is outside of USDA's purview and is not SNAP related.

Commenters #2-5 and 7-9: FNS has carefully considered the comments from all the commenters about the proposed information collection regarding FNS' request for total retail sales percentages concerning gasoline and cold foods prepared on-site; and FNS' request for the precise number of staple food varieties.

In regard to the concerns expressed around the gasoline sales category, gasoline sales are a key factor in understanding a store's business model. We will revise the application by adding a question "Do you sell gasoline" with a "yes" or "no" selection. We will also remove gasoline as a stand-alone sales category in the application and will include it in the "Other Nonfoods" sales category which will consequently be updated to the sales category of "Nonfoods".

FNS would also like to note that we have removed individual sales categories for alcohol, tobacco, and lottery.

FNS would like to clarify that the collection of the percentage of sales from cold foods prepared on site is necessary for FNS to make a restaurant determination.

The question was revised from “cold prepared food” to “cold food prepared on-site” to clarify the types of foods that should be included in this sales category. While FNS did not make changes to FNS’s definition of hot and/or cold foods prepared on-site, we will revise the application to clarify that percentages for these categories should only include prepared foods that are consumed on the premises or sold for carryout (i.e., foods not intended for home preparation or consumption).

Section 765 of the Omnibus Appropriate Act of 2018 which was signed into law prohibited the USDA from implementing the “Definition of “staple Food” – Acceptable Varieties in the Four Staple Food Categories” provision (7 CFR 271.2 and 7 CFR 278.1 (b)(1)(ii)(A)) of the 2016 final rule until the USDA promulgates regulatory amendments which modify the “Definition of “Staple Food” – Acceptable Varieties in the Four Staple Food Categories” provision of the 2016 final rule. As a result, the question related to staple food varieties for this information collection was modified to satisfy the prohibitions set forth in Omnibus Appropriation Act of 2017 while still allowing flexibility for changes in minimum requirements should regulatory amendments adjust said provisions in the near future.

FNS would also like to address commenter #7’s concern regarding the estimated burden for this information collection. The average public reporting burden for this collection of

information is estimated to be 9.13 minutes per response, including the time for reviewing, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. FNS used FY 2017 data in our calculation of burden estimates associated with this information collection. We do not intend to incorporate public reporting estimates for resubmission of responses into the burden assessment for this collection. Further, instructions for this collection provide information related to breadth and depth of stock requirements which include, but are not limited to hyperlinks to FNS internet resources concerning such requirements.

FNS greatly shares commenter #7's concern around low food access areas. The Agriculture Act of 2014 amended Section 9(a) of the Food and Nutrition Service Act of 2008 to allow FNS to consider whether an applicant retailer is located in an area with significantly limited access to food when determining the qualifications of that applicant. The final rule titled "Enhancing Retailer Standards in the Supplemental Nutrition Assistance Program (SNAP)" was published December 15, 2016 in 81 FR 90675. In part, this final rule established regulations at 7 CFR 278.1(b)(6) allowing the Agency to consider "need for access" when a retailer fails to meet certain eligibility requirements.

On May 22, 2018 FNS shared a draft of the proposed changes and requested feedback from three national retailer associations including the Food Marketing Institute, the National Grocers Association, and the National Association of Convenience Stores. The proposed revision incorporates the feedback FNS received with the exception of any changes that would render FNS unable to make an eligibility decision or complete retailer

monitoring activities. On August 8, 2018, prior to the 60-day notice being published FNS responded to all feedback from the retailer associations, sharing the revised application. FNS addressed each concern and explained why we could or could not accommodate the request.

**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.

Additionally, all information provided on the application is information "provided by the retailer" and is protected under section 9(c) of the Food and Nutrition Act of 2008, as

amended, (the Act) (7 U.S.C. 2011 et. Seq.) and as such, not subject to release under the Freedom of Information Act (FOIA).

**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 22,004 hours (16,847 hours for the application forms + 4,437 for e-Authentication + 720 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 143,357 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 22,004 hours (16,847 hours for the application forms + 4,437 for E-Authentication + 720 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
<b>Reporting</b>											
Farms, Business for not for profit	SNAP Retailer, Farmers' Market, and Meal Service	Applications Received	252	1,384	1	1,384	0.3167	438.27	455.41		(17.14)
		Applications Received	252-E	31,480	1	31,480	0.25	7,870	8,199.75		(329.75)
		E-Authentication	252-E and FNS-252-FE	33,213	1	33,213	0.1336	4,437.25	4,622.69		(185.44)
		Applications Received	252-FE	1,730	1	1,730	0.25	432.50	450.00		(17.50)
		Applications Received	252-2	386	1	386	0.25	96.50	94.75		1.75
		Applications Received	252-C	5,658	1	5,658	0.25	1,414.50	1,192.50		222
		Store Visits		43,126	1	43,126	0.0167	720.20	704.16		16.04
		Reauthorization	252-R	26,377	1	26,377	0.25	6,594.25	3,659.50		2,934.75
<b>Sub-Total For Farm &amp; Business</b>				<b>143,354</b>	<b>1</b>	<b>143,354</b>	<b>0.153505</b>	<b>22,003.47</b>	<b>19,378.76</b>		<b>2,624.71</b>
Federal	Military Commissaries	Applications Received	252-E	3	1	3	0.3167	0.95	1.27		(0.32)
		Reauthorization	252-R	0	1	0	0.25	0	0.75		(0.75)
<b>Sub-Total For Federal Respondents</b>				<b>3</b>	<b>1</b>	<b>3</b>	<b>0.3167</b>	<b>0.95</b>	<b>2.02</b>		<b>(1.07)</b>
<b>Grand Total Reporting Burden</b>				<b>143,357</b>	<b>1</b>	<b>143,357</b>	<b>0.1534938</b>	<b>22,004.42</b>	<b>19,380.78</b>		<b>2,623.64</b>
<b>SUMMARY OF BURDEN FOR THIS COLLECTION</b>				<b>143,357</b>	<b>1</b>	<b>143,357</b>	<b>0.1534909</b>	<b>22,004</b>	<b>19,381</b>		<b>2,624</b>

\*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 total annual cost to respondents with fully loaded wages is **\$1,736,896.74** (\$1,305,937.40 + \$430,959.34). The estimate of respondent cost is based on May 2017 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 \$1,305,937.40 (General and Operations Manager wage @ \$59.35 per hour x 22,004 Burden Hours). FNS also estimates the total annual cost to respondents with fully loaded wages is \$1,305,937.40 x 0.33 = \$430,959.34. 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 overall estimated annual cost to the Federal government with fully loaded wages is **\$3,909,103.24** ( $\$779,332.74 + \$247,279.80 + 2,167,287.40 + \$715,204.84$ ). The estimated annual cost to the Federal government for activities below is  $\$779,332.74 \times 0.33 = \$247,279.80$ . This cost includes staffing support costs of \$21,832.74 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 13 Step 5 and 14 hours for the Branch Chief at a GS 14 Step 1 wage based on the 2018 Washington DC-Northern Virginia locality area hourly rate of \$52.66 and \$54.91, 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 \$750,000 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 \$2,882,492.24 ( $\$2,167,287.40 \times 0.33 = \$715,204.84$ ). This includes; staffing support

costs of \$167,670.48 (based on the 2018 Washington DC-Northern Virginia locality area hourly rate of a GS 12, Step 10 wage of \$50.80 per hour x 3,300.60 hours (22,004 burden hours x 15%)) for evaluation and processing of an estimated 27,536 retailer applications (143,357 respondents – 33,213 eAuthentication = 110,144 respondents x 0.25), and review of annual documentation from reports and store visits]; printing costs of \$102,000 for paper applications and authorization approval kits; assembly and mailing costs of \$53,400; and \$1,844,217 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 \$136, 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 2017, FNS spent approximately \$4.6 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 19,381. Due to adjustments, the estimated annual burden is 22,004, an increase of 2,623 hours. The following is an adjustment due to an increase in applications and small business received and approved. There are program changes and those didn't impact the burden estimates. The estimated total number of annual responses increased. The current total number of responses is 132,599; FNS is

seeking 143,357 as an estimated total annual responses. This revision reflects an increase of 10,758 total annual responses. An explanation of program changes and adjustment follows:

**Program Changes:**

FNS is amending all SNAP applications forms, where applicable, FNS intends to (1) rename Question 3, “Doing Business As (if difference from Store Name)” to “Legal Business Name (if different from Store Name)”, (2) revise Question 14 to remove the sentence requiring spousal information for businesses located in community property states, and remove the word “spouse” in the Business Title section in Questions 14a-14d, (3) delete Question 18 regarding restaurant licensing, (4) add a new Question 18, “Do you sell gasoline” with a “yes” or “no” selection, (5) revise Question 22 concerning total retail sales in the following manner: (a) respondents will provide a response for either estimated or actual sales for a one year period. If actual sales are provided, the respondent will indicate the applicable tax year for this information, and (b) provide a percentage of total retail sales for each category of product sold: staple foods; accessory foods; hot foods, cold foods prepared on site; and non-food items, (5) add a new sentence to the Certification and Signature Statement to more clearly outline the risks for owners that are disqualified or fined for violation of Program rules; and (6) where appropriate, re-number the questions and update assistance material such as the General and Specific Instructions sections and on-line help screens. With the exception of the question identified in 4 and 4(b) above, no new questions or data information is being asked.



FNS shared a draft of the proposed changes with our stakeholders. The proposed revision incorporates the feedback FNS received with the exception of any changes that would render FNS unable to make an eligibility decision or complete retailer monitoring activities. FNS would like to clarify that while cold foods prepared on-site, such as at an in-store deli or salad bar are eligible for purchase with SNAP benefits, collection of the percentage sales information is still necessary for FNS to make a restaurant determination. The feedback FNS incorporated includes asking for sales percentages as opposed to an exact sales amount for each category, removing the requirement to provide individual sales figures for lottery, tobacco, gasoline, and alcohol, rewording “cold prepared foods” to “cold food prepared on site,” continuing to separate hot foods from cold foods, and clarifying the instructions for Question 22. The aggregated percentages of non-food sales, and of accessory sales, will provide FNS with an indicator as to whether a criteria B eligibility or restaurant assessment are necessary.

**Adjustments:**

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 (1,438 previously reported; 1,384 this submission, which is a decrease of 54 due to an adjustment); FNS-252-E (32,799 previously reported; 31,480 this submission, which is a decrease of 1,319 due to an adjustment); e Authentication (34,601 previously reported; 33,213 this submission, which is a decrease of 1,388 due to an

adjustment); FNS-252-FE (1,802 previously reported; 1,730 this submission, which is a decrease of 72 due to an adjustment); FNS-252-2 (379 previously reported; 386 this submission, which is an increase of 7 due to an adjustment); FNS-252-C (4,770 previously reported; 5,658 this submission, which is an increase of 888 due to an adjustment); Store Visits (42,165 previously reported; 43,126 this submission, which is an increase of 961 due to an adjustment); and FNS-252-R (14,641 previously reported; 26,377 this submission which is an increase of 11,736 due to an adjustment).

**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.

