

SUPPORTING STATEMENT – PART A for

OMB Control Number 0584-0008:

**Supplemental Nutrition Assistance Program – Store Application Forms FNS-252, FNS-252-C,
FNS-252-E, FNS-252-FE, FNS-252-R; and FNS-252-2**

Bea Fitzgerald, Project Officer

Supplemental Nutrition Assistance Program

USDA, Food and Nutrition Service

1320 Braddock Place, Room 5042

Alexandria, VA 22314

(703) 305-2525

E-Mail: Bea.Fitzgerald@usda.gov

Table of Contents

Part A Justification

- A1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY
- A2. PURPOSE AND USE OF THE INFORMATION
- A3. USE OF INFORMATION TECHNOLOGY AND BURDEN REDUCTION
- A4. EFFORTS TO IDENTIFY DUPLICATION
- A5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES
- A6. CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY
- A7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINES OF 5 CFR 1320.5
- A8. COMMENTS TO THE FEDERAL REGISTER NOTICE AND EFFORTS FOR CONSULTATION
- A9. EXPLAIN ANY DECISIONS TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS.....13-14
- A10. ASSURANCES OF CONFIDENTIALITY PROVIDED TO RESPONDENTS
- A11. JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE
- A12. ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION
- A13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN
- A14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT.....19-20
- A15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS
- A16. PLANS FOR TABULATION, AND PUBLICATION AND PROJECT TIME SCHEDULE
- A17. DISPLAYING THE OMB APPROVAL EXPIRATION DATE
- A18. EXCEPTIONS TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19

Appendices:

- Appendix 1.0: Background
- Appendix 1.1: Burden Narrative
- Appendix 2: FNS-252 (English – paper)
- Appendix 3: FNS-252 (Spanish - paper)
- Appendix 4: FNS-252-C (paper)
- Appendix 5: FNS-252-E (online)
- Appendix 6: FNS-252-FE (online)
- Appendix 7: FNS-252-R (paper)
- Appendix 7:1: FNS-252-R-ORA (screenshots of online FNS-252-R)
- Appendix 8: FNS-252-2 (paper)
- Appendix 9: Public Comment 1 – California Welfare Fraud Investigators Association (CWFIA)
- Appendix 9:1: Public Comment 2 – NACS/SIGMA
- Appendix10: FNS Response to Public Comment 1 – California Welfare Fraud Investigators Association (CWFIA)
- Appendix10:1: FNS Response to Public Comment 2 – NACS/SIGMA
- Appendix 11: System of Record Notice (SORN) USDA/FNS-9 Supplemental Nutrition Assistance Program
Retailer Information

Justification

- 1. 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 under the Act to determine the eligibility of retail food stores, wholesale food concerns, and food service organizations applying for authorization to accept and redeem SNAP benefits, and to monitor these firms for continued eligibility, and to sanction stores for non-compliance with the Act, and for Program management.

Section 9(a) of the Act requires food stores and meal services (firms) to submit applications to FNS for approval prior to participating in the SNAP. The Act specifies that only those applicants whose participation will “effectuate the purposes of the program” should be authorized. According to the Act, some of the factors to consider in making an eligibility determination of an applicant firm are the nature and extent of the food business conducted by the applicant; the volume of SNAP benefit business, which can reasonably be conducted by the applicant; and the business integrity and reputation of the applicant.

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, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used 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-C, FNS-252-E, FNS-252-FE, and FNS-252-2 are used for this information collection requirement. FNS is also responsible for requiring updates to application information and reviewing retail food store applications at least one every five years to ensure that each firm is under the same ownership and continue to meet eligibility requirements. For reauthorization, form FNS-252-R is used. Form FNS-252-R

is the paper application and FNS-252-R-ORA is the electronic version of this form. The SNAP Online Reauthorization Application (FNS-252-R-ORA) is generated in the Store Tracking and Redemption System (STARS), and data fields are auto-populated with the information maintained in STARS. When FNS-252-R is identified or mentioned, it is also used interchangeably with the FNS-252-R-ORA. Firms designated by FNS due for reauthorization are sent a letter containing their unique Reauthorization Customer Number and Password and are encouraged to complete the online application (FNS-252-R-ORA) in lieu of completing and mailing a paper application (FNS-252-R) to FNS. The FNS and other Federal Government agencies examine such information during compliance reviews, audit reviews, special studies or evaluation efforts. In accordance with the System of Record Notice (SORN) USDA/FNS-9 Supplemental Nutrition Assistance Program Retailer Information, FNS may share this information with other Federal and State entities to assist in the administration and enforcement of the Food and Nutrition Act of 2008, as well as other Federal and State laws, or 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. The SSNs and EINs of store owners will only be shared with Federal Agencies which maintain those numbers in their files. There is no third party reporting burden associated with this collection because FNS is responsible for disclosing this data to other agencies.

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 makes every effort to comply with the Government Paperwork Reduction Act by providing electronic submission in lieu of paper where feasible. 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. 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 82 percent of retailers submit applications online.

Firms designated by FNS due for reauthorization are also encouraged to complete the SNAP Online Reauthorization Application, form FNS-252-R-ORA in lieu of completing and mailing a paper application, FNS-252-R to FNS. The number of questions asked on form FNS-252-R and FNS-252-R-ORA is limited to those that are relevant to the reauthorization process. Data from the STARS is auto-populated on the online application. Retailers are only required to select a “No” response if the filtered

information FNS has on file is no longer correct, thereby decreasing the time it takes to complete this form.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

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 application 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 retailer 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, including small businesses. FNS estimates that 85 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. The collection of information is conducted in a matter consistent 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, required by 5 CFR 1320.8 (d), 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. Specifically address comments received on cost and hour burden.

A notice was published in the Federal Register on July 6, 2020, Volume 85, pages 40186-40187. FNS received two comments from the public in response to this Notice.

Commenter #1 was a non-profit organization representing the California Welfare Fraud Investigators Association (CWFIA). CWFIA employs Welfare Fraud Investigators and other employees whose primary duty is dealing with fraud in public assistance program.

Commenter #2 was a law firm representing the National Association of Convenience Stores (NACS) and Society of Independent Gasoline Marketers of America (SIGMA).

Commenter #1 supports the proposed information collection regarding FNS' revision to clarify questions, instructions and examples concerning stocking units of staple food varieties on a continuous basis and stated the additional requirement of listing multiple varieties of the basic food staples will help thwart the unscrupulous retailer who has the intent to defraud the SNAP program. Additionally, CWFIA stated it fully supports any policy change that will increase program integrity, and commented that this revised application will achieve that goal.

Commenter #2 had concerns regarding Staple Food Varieties and Total Retail Sales and stated FNS did not address the public comments they provided on October 15, 2018, in reference to a Federal Register Notice published on August 17, 2018.

Response:

Commenter #1: FNS greatly shares the commenters concern and appreciates CWFIA's support to help protect the integrity of the SNAP. No action was required to be taken on these comments.

Commenter #2: FNS acknowledges the commenters request for further information regarding the SNAP Retailer Store Applications for this proposed information collection. Due to a clerical error we failed to provide the information requested. FNS sincerely apologizes for this omission.

In regard to the concerns expressed that FNS has not addressed comments provided on October 15, 2018, regarding total retail sales percentages concerning gasoline and cold foods prepared on-site; and FNS' request for the precise number of staple food varieties, and therefore, those comments have been resubmitted concerning this information collection request.

FNS has carefully reviewed the resubmitted comments and it appears the commenter has not reviewed the revised SNAP Retailer Application forms, which FNS implemented on January 31, 2019, and for which this information collection expires on January 31, 2021.

On November 27, 2018, FNS responded to commenter #2 comments submitted on October 15, 2018. In our response, we acknowledged their concern around the gasoline sales category; however, gasoline sales are a key factor in understanding a stores business model.

We stated we would revise the application by adding a question "Do you sell gasoline" with a "yes" or "no" selection. We also stated we would remove gasoline as a stand-alone sale 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 also clarified 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 food that should be included in this sales category. While FNS did not make changes to FNS’ definition of hot and/or cold foods prepared on-site, as stated in our response of November 27, 2018, we revised the application instructions 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 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 the Omnibus Appropriation Act of 2017 while still allowing flexibility for changes in minimum requirements should regulatory amendments adjust said provisions in the near future.

In conclusion, commenter #2’s concerns have been addressed and the current SNAP retailer application forms incorporated the feedback FNS received from the prior information collection request, with the exception of any changes that would render FNS unable to make an eligibility decision or complete retailer monitoring activities. FNS addressed each concern and explained why we could or could not accommodate the request.

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 format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

FNS shared a draft of the proposed changes with our stakeholders and consulted with the following individuals/organizations about burden estimates and/or other characteristics of this information collection. On May 18-19, 2020, FNS received feedback from Deanna Hafner, Licensing Manager, Kwik Trip, Inc. (DHafner@Kwiktrip.com); Earl Allen, Marketing Manager, Noon's Food Stores (earl@noons.com); and Tracy Carter, CFO, Sprint Food Stores (tcarter@sprintfs.com). The respondents provided comments regarding Staple Food Varieties and Depth of Stock in Questions 19-21 and Retail Sales in Question 22. While FNS does not intend to make changes to the application at this time, those comments were reviewed and will be considered for future application and system enhancements. Additionally, FNS also received comments regarding the estimated burden hour and the respondents stated the current burden hour for form FNS-252 is inaccurate. The current estimated burden hour is 19 minutes; respondents stated it to 60 to 90 minutes. The proposed revision incorporates an increase in the estimated reporting burden to 90 minutes for this information collection.

- 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 contains the following personal information regarding owners and officers: Name, home address, Social Security Number (SSN), and date of birth (DOB). The SSNs are collected only from owners of sole proprietorships, partnerships, principal shareholders of private corporations, and officers of cooperatives are in the STARS database.

FNS published a Privacy Act System of Records Notice (SORN) to specify the uses to be made of the information in this collection. This notice titled “USDA/FNS-9 Supplemental Nutrition Assistance Program Retailer Information” was published in the Federal Register on December 27, 2010, Volume 75, Number 247, and is located on pages 81205-81209 (Appendix 11).

Section 9 of the Act, U.S.C. 2018, authorizes collection of the information on the application. Section 278.1(b) of the SNAP regulations provide 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 the Digital Infrastructure Services Center in Kansas City, Missouri.

- 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 or State 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. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

The total estimated annual burden associated with this information collection is 19,887.58 hours, rounded to 19,888 (15,226.71 hours for the application forms + 3,942.40 for e-Authentication + 678.42 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-I.

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 123,864 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 the information collection is 19,887.58 hours, rounded to 19,888 hours (15,226.71 hours for the application forms + 3,942.40 for e-Authentication + 678.42 hours for the FNS Store Visit).

The description of the reporting burden for SNAP Retailer Application forms are contained in the Burden Narrative. There is no third-party disclosure reporting burden associated with this collection, because FNS is responsible for disclosing this data to other agencies. 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, Businesses for not for profit	SNAP Retailer, Farmers' Market, and Meal Service	Applications Received	252	1,467	1	1,467	1.5000	2,200.50	438.27		1,762.23
		Applications Received	252-E	28,556	1	28,556	0.25	7,139.00	7,870.00		(731.00)
		E-Authentication	252-E and FNS-252-FE	29,509	1	29,509	0.1336	3,942.40	4,437.25		(494.85)
		Applications Received	252-FE	953	1	953	0.25	238.25	432.50		(194.25)
		Applications Received	252-2	571	1	571	0.25	142.75	96.50		46.25
		Applications Received	252-C	4,574	1	4,574	0.25	1,143.50	1,414.50		(271.00)

		Store Visits		40,624	1	40,624	0.0167	678.42	720.20		(41.78)
		Reauthorization	252-R	3,687	1	3,687	0.25	921.75	6,594.25		(5,672.50)
		Reauthorization*	252-R-ORA	13,919	1	13,919	0.25	3,479.75	0.00		3,479.75
Sub-Total For Farm & Business				123,860	1	123,860	0.1605548	19,886.32	22,003.47		(2,117.15)
Federal	Military Commissaries	Applications Received	252-E	4	1	4	0.3167	1.26	0.95		0.31
Sub-Total For Federal Respondents				4	1	4	0.3167	1.26	0.95		0.31
Grand Total Reporting Burden				123,864	1	123,864	0.1605598	19,887.58	22,004.42		(2,116.84)
SUMMARY OF BURDEN FOR THIS COLLECTION				123,864	1	123,864	0.1605631	19,888	22,004		(2,116.)

*Note: the Farms and Business for-not-for-profit 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.

***: the respondents for FNS-252-R-ORA were not identified in our previous submission and were counted in the total number of respondents for FNS-252-R.

B. Provide estimates of annualized cost 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 May, 2019 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 with fully-loaded wages is \$1,564,579.01 (\$1,176,375.20 (General and Operations Manager wage @ \$59.15 per hour x 19,888 Burden Hours) annual base cost + \$388,203.81 fringe benefits) and we used 0.33 percent to account for fully-loaded wages. 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 questions 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. 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 combined estimated total annualized cost to the Federal government is \$442,256.68 with fully-loaded wages included. This information collection estimates a total of 14 hours for the FNS Headquarters' Branch Chief time to review and edit this collection per year; for a GS-14, Step 6, in the Washington, DC locality, at \$67.82 per hour for a total of \$949.48 (plus \$414.32 which is 33 percent of this cost = \$1,262.80 for fully-loaded wages). This information collection also estimates a total of 400 hours staff time for FNS Headquarters' Program Analyst time to draft, edit and manage this collection, per year, for a GS-13, Step 6, in the Washington, DC locality, at \$57.39 per hour for a total of \$22,956 (plus \$7,575.48 which is 33 percent of this cost = \$30,531.48 for fully-loaded wages). Additionally, \$4,000 in Federal cost for contractor support for revisions to paper forms FNS-252, 252-2, 252-C and 252-R; and approximately \$405,712.40 for contractor services for enhancements to the functionality of the STARS system and the development of computer screen and revisions to the online applications, FNS-252-F, FNS-252-FE and FNS-252-R-ORA, and reports to support the collection; and \$750.00 for documentation translation services.

Additionally, the estimated re-occurring annual cost to the Federal government is \$2,734,354.40. This estimation includes; staffing support costs of \$160,436/94 (plus \$52,944.19 which is 33 percent of this cost = \$213,381.13 for fully-loaded wages) based on the 2020 General Schedule Locality Pay Tables for the Washington DC-Northern Virginia locality area hourly rate of a GS 12, Step 10 at \$53.78 per hour x 2,983.20 hours (19,888 burden hours x 15%) for evaluation and processing of an estimated 23,588.75 retailer applications (123,864 respondents – 29,509 eAuthentication = 94,355 respondents x 0.25), and review of annual documentation from reports and store visits); printing costs of \$38,400 for paper applications and authorization approval kits; assembly and mailing costs of \$53,400; storage costs of \$13,836; and \$2,415,337.27 for the Retail Service Center Contract.

FNS pays approximately \$144.75, 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 2019, FNS spent approximately \$5.2 million on store visits.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

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 22,004. Due to corrections, the estimated annual burden we are requesting for this revision is 19,888, a decrease of 2,117 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 143,357; FNS is seeking 123,864 as an estimated total annual responses. This revision reflects a decrease of 19,493 total annual responses. An explanation of program changes and adjustments follows:

Program Changes:

FNS is amending all SNAP application forms, where applicable, to (1) clarify questions, instructions and examples concerning stocking units of staple food varieties on a continuous basis; (2) adding Individual Taxpayer Identification Number (ITIN) as an alternative form of documentation that respondents may submit to FNS in lieu of a Social Security Number (SSN); (3) inserting “ITIN in the fifth bullet of the Privacy Act Statement; (4) inserting “ITIN” in the third, fourth, and seventh bullet of the Use and Disclosure – Routine Uses section; and (5) changing the text in the last bullet of the Certification and Signature Statement from “could” to “may” to clarify consequences of being listed in the General Service Administration’s (GSA) System for Award Management (SAM). FNS also intends to make design changes by adding spacing and horizontal lines separating Questions 21-26 and revise FNS’ address listed in the Privacy Act and Paperwork Reduction Notice section. Due to recent SNAP website updates, FNS is also updating three website links within the application instructions. The links are: How to Apply; Contacting the RSC; and Retailer Training. The revisions are needed to bring the format and content into conformance with the Agency’s current policy. No additional burden was placed upon the respondents as a result of this change.

Adjustments:

FNS received feedback concerning the burden hour estimate associated with form FNS-252. The burden associated previously reported is 19 minutes. The respondents stated they spent 60 to 90 minutes to complete this information collection. The proposed revision incorporates the feedback FNS received and increases the estimated burden hours an additional 71 minutes. This adjustment revises the estimated burden from 19 minutes (0.3167) to 90 minutes (1.5000) for this information collection.

Additionally, the following are adjustments due to the fluctuation in the number of applications received and approved by FNS: FNS-252 (1,384 previously reported; 1,467 this submission, which is an increase of 83 due to an adjustment); FNS-252-E (31,483 previously reported; 28,556 this submission, which is a decrease of 2,920 due to an adjustment); eAuthentication (33,213 previously reported; 29,509 this submission, which is a decrease of 3,704 due to an adjustment); FNS-252-FE (1,730 previously reported; 953 this submission, which is a decrease of 777 due to an adjustment); FNS-252-2 (386 previously reported; 571 this submission, which is an increase of 185 due to an adjustment); FNS-252-C (5,658 previously reported; 4,574 this submission, which is a decrease of 1,084 due to an adjustment); Store Visits (43,126 previously reported; 40,624 this submission, which is a decrease of 2,502 due to an adjustment); FNS-252-R (26,377 previously reported; 3,678 this submission which is a decrease of 22,650 due to an adjustment) and FNS-252-R-ORA (0 previously reported; 13,919 this submission, which is an increase of 13,919 due to reporting error adjustment).

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

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 of the OMB 83-I "Certification for Paperwork Reduction Act."**

There are no exceptions to this certification statement.