

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.**

Lindsey Poole

Program Analyst

Supplemental Nutrition Assistance Program

USDA, Food and Nutrition Service

1320 Braddock Place

Alexandria, Virginia 22314

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A1. 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 under the Food and Nutrition Act of 2008, as amended (“the Act”, U.S.C. Title 7, Chapter 51, Appendix A.1) to determine the eligibility of retail food stores, wholesale food concerns, and food service organizations applying for authorization to accept and redeem Supplemental Nutrition Assistance Program (SNAP) benefits, 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 the Food and Nutrition Service (FNS) for approval prior to participating in the Supplemental Nutrition Assistance Program (SNAP, or “the Program”). The Act specifies that only those applicants whose participation will “effectuate the purposes of the program” should be authorized. In addition to these forms, during new authorization or reauthorization, FNS may conduct an on-site store visit of the firm to confirm that the information provided on an application is correct. An FNS representative or store visit contractor obtains permission to complete the store visit checklist, photograph the store and asks the store owner or manager about the continued ownership of the store. 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 expected to 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), Appendix A.2) 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 (26 U.S.C. 6109, Appendix A.3). These requirements can be found at 7 CFR 278 and 279 of the SNAP regulations (Appendix A.4).

A2. Purpose and Use of the Information.

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 FNS in the administration of the Program with Private Sector respondents (Farms; Business-for-profit and not-for-profit) and Federal Government (Military Commissaries). As part of its responsibility under the Act, FNS accepts applications from retail food establishments and meal service programs that wish to

participate in SNAP. FNS staff reviews a firm's application to determine whether applicants meet eligibility requirements and makes 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 (Appendices B.1-B.5 and B.8).

FNS is also responsible for requiring updates to application information and reviewing retail food store applications at least once every five years to ensure that each firm is under the same ownership and continues to meet eligibility requirements. For reauthorization, form FNS-252-R is used (Appendix B.6). The SNAP Online Reauthorization Application (FNS-252-R-ORA, Appendix B.7) is an electronic version of the paper form and is generated in the Store Tracking and Redemption System (STARS). Data fields are auto-populated with the information maintained in STARS. When FNS-252-R is identified or mentioned in this submission, it also includes FNS-252-R-ORA. Firms FNS designates as 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.

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 (Appendix C), 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 States 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.

Collecting the SSN for the owners of an applicant firm is critical for the integrity of the program. It allows FNS to identify individuals previously sanctioned or convicted under the Food and Nutrition Act and relevant regulations. FNS shares SSNs and EINs of store owners with the U.S.D.A. Office of the Inspector General, the Department of Treasury, and the Department of Justice. There is no third-party reporting burden associated with this collection because FNS is responsible for disclosing this data to other agencies.

A3. Use of information technology and burden reduction.

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 of 2002 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 to it 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/retailer/application-status>.

Firms FNS designates as 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. Data from the STARS is auto-populated on the online application, and retailers only update it if it is incorrect, which reduces the burden.

We anticipate 75 percent of applications will be submitted electronically (FNS-252-E, FNS-252-FE and FNS-252-R-ORA).

A4. Efforts to identify duplication.

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, none meet the current needs of this data collection requirement. The applicant's SSN and EIN are collected as a part of other information collections. It is necessary to collect them from the respondent again because sharing this information is restricted by law, other government entities are prohibited from sharing this information with FNS. FNS also requires an update to application information previously submitted by the retailer and this data collection is not available from any other source.

A5. Impacts on small businesses or other small entities.

If the collection of information impacts small businesses or other small entities (Item 5 of

OMB Form 83-I), 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, provide clearer instructions to guide the applicant to report accurate information and limit information collected to what is necessary to comply with statutory provisions and to protect program integrity.

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 website at <https://www.fns.usda.gov/snap/apply-to-accept> and <https://www.fns.usda.gov/snap/reauthorization-application-sign>. The online applications offer enhanced features: in FNS-252-R-ORA, 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.

A6. Consequences of collecting the information less frequently.

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.

This information collection is on-going and required to obtain or retain benefits granted by

SNAP during program participation, this collection is also 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 authorization or reauthorization application, the consequence to the Federal program would be a 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 relevant program regulations. The Food and Nutrition Act at 7 USC 2018(a)(2)(A) requires the Secretary to issue regulations providing for periodic reauthorization of retail food stores and wholesale food concerns and does not specify the period. Regulations require reauthorization at least every 5 years (7 CFR 278.1(j)). 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.

A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5.

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 manner consistent with the guidelines in 5 CFR 1320.5.

A8. Comments to the Federal Register Notice and efforts for consultation.

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.

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.

A 60-day notice was published in the Federal Register on September 29, 2023, (88 FR 67226).

FNS received 3 comments. Two were relevant to the information collection. Commenter 1 represents an association for cooperative businesses across all sectors of the U.S. economy.

Commenter 2 represents a business services cooperative for consumer-owned retail food co-ops located throughout the United States, and its members are food cooperatives, many of which are SNAP authorized retailers.

Commenter 1 and Commenter 2 both state that the cooperative business model is not clearly reflected in the applications. They recommended similar revisions to the same questions and instructions in the retailer application forms and instructions to reduce confusion by applicant food cooperatives. These revisions include removing the request for

personal information for owners and officers and adding a request for documentation from the board of directors designating a certain position, without naming an individual, as responsible for store operations and authorized to sign the SNAP retailer application. After the revisions are in place, they also recommend technical assistance to authorized cooperatives to update their FNS records with the information required by the revised forms and accurately capture their status as cooperatives. Both commenters note that some food cooperatives have faced significant barriers to maintaining SNAP retailer authorization. They state that cooperatives are owned by member-owners who each own an equity share, and that changes to the composition of the board of directors or to management do not constitute a change in ownership. Furthermore, they state that although some cooperatives are nonprofit organizations, most are not.

Commenter 1 stated that it is burdensome to collect personal information from all member-owners of cooperatives, and it does not have practical utility. Commenter 1 recommended several other changes, for example to questions and the corresponding instructions about business and ownership type, to provide response options that align with the cooperative model. Public Comment 1 is attached in full as Appendix D.1.

Commenter 2 stated that the information collected does not have practical utility, and that the FNS estimates for the time it takes to complete forms are inaccurate because they do not capture the time it may take a food cooperative to reach an FNS staff member who understands the cooperative business model. Commenter 2 states that this is especially true if there is confusion about the ownership of the cooperative. Commenter 2 states that it would be impractical and unnecessary to collect personal information from all member-owners of a food cooperative.

Commenter 2 suggests revisions similar to those Commenter 1 suggests, including adding the response option “Cooperative (for profit or non-profit)” to the ownership type question. Commenter 2 provided examples of challenges their member organizations have faced in maintaining SNAP authorization, which highlights the challenge that food cooperatives face when the contact person in the last SNAP retailer application is no longer employed at the cooperative and FNS is unwilling to speak with anyone else for privacy reasons. Public Comment 2 is attached in full as Appendix D.2.

Response:

FNS appreciates both comments on the challenges that food cooperatives have faced in maintaining SNAP retailer authorization and the suggestions from both commenters to address them.

FNS agrees that it would be impractical and unnecessary for cooperatives to submit information including name, home address, social security number, for each of perhaps thousands of member-owners of a cooperative business. However, authorization as a SNAP retailer requires that FNS have information on record for the individuals who are legally responsible for the business (7 USC 2018 (a)(1)(B)(v), 7 CFR 278.1(o), 7 CFR 278.6(f)(3)). In the case of cooperatives, this responsibility is held by the board of directors and any other officer such as a Chief Executive Officer (CEO). Therefore, the retailer authorization application forms must collect this information for the officers of a cooperative.

Furthermore, a change in the composition of the board of directors or in the other officers, such as the CEO, does constitute a change in the persons responsible for the operation of the business, and a food cooperative should notify FNS each time this occurs so that FNS can work with the cooperative to update this information. Timely updates will help cooperatives

avoid situations where FNS cannot speak with the current officers because of privacy concerns when the contact person on record is no longer with the cooperative.

FNS wishes to note that a “private nonprofit cooperative food purchasing venture” is a specific retailer type accorded certain exceptions by statute (7 USC 2012 (o)(4) and 7 USC 2019), and the application must identify them separately. For this reason, the ownership question contains a response option for nonprofits and does not have a response option for food cooperatives, which would conflate nonprofit and for-profit cooperatives. The FNS response to Public Comment 1 is attached in full as Appendix D.3, and the FNS response to Public Comment 2 is attached in full as Appendix D.4.

The following individuals/organizations have been consulted about burden estimates and/or other characteristics associated with this data collection:

First Name	Organization	Notes
Isabel	Sabrosa Venezuela	Stakeholder did not respond (Form FNS-252-2).
Cassie	The Cajun Butcher, LLC	It would have taken 15 minutes but took 30 because of confusion about creating a login.gov account (Form FNS-252-E).
Hamed	Darya Afghan Market, LLC	It took 2-3 hours to complete, and the instructions are clear (Form FNS-252-E).

The webpage with instructions to submit an electronic SNAP application for initial authorization currently lists three steps (<https://www.fns.usda.gov/snap/apply-to-accept>).

The first is to create a login.gov account and the second is to complete the SNAP retailer application. The instructions on the webpage caused confusion for one stakeholder we consulted, and FNS is researching how to better reflect the application process in these instructions to avoid this confusion. The instructions on the webpage can be clarified without any change to any of the forms in this submission.

**A9. Explain any decisions to provide any payment or gift to respondents.
Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payment or gift will be provided to respondents.

A10. Assurances of confidentiality provided to respondents.

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

FNS complies with the Privacy Act of 1974. The application requests the name, home address, Social Security Number (SSN) and date of birth of all owners, members, partners, primary shareholders and officers of sole proprietorships, partnerships, limited liability company, and privately held corporations, including nonprofit organizations.

Section 9 of the Food and Nutrition Act, 7 U.S.C. 2018, authorizes collection of the information on the application. The Social Security Act (42 U.S.C. 405(c)(2)(C)) and the SNAP regulations (7 CFR 278.1(b)) provide for the collection of the owners' SSN/EIN and tax information.

The information provided will be kept private, and only FNS employees administering and overseeing retailer participation will access social security numbers and employer identification numbers. In accordance with the Social Security Act and the Internal Revenue Code, applicant social security numbers and employer identification numbers may be disclosed only to other Federal agencies authorized to have access to social security numbers and employer identification numbers 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)).

Because FNS collects personally identifiable information on its retailer applications, each form must display a disclosure statement on the form that outlines the Privacy Act protections for those completing it.

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 (75 FR 81205-81209, Appendix C).

Personally identifiable information from respondents 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.

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), except that if a retailer has been sanctioned for violations of the Program, after the time for administrative and judicial appeals has expired FNS may disclose the name and address of the store, the owner(s) name(s) and information about the sanction itself.

This information collection request was reviewed and cleared by FNS Privacy Office, Deea Coleman, on 12/21/2023.

A11. Justification for any questions of a sensitive nature.

Provide additional justification for any questions 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.

Law and regulation authorize FNS to request SSNs (42 U.S.C. 405(c)(2)(C)) and EINs (26 U.S.C. 6109(f)) from applicants. Applicant firms are not required to disclose these numbers to us, but FNS will deny an application that does not have these numbers because we cannot guarantee the legitimacy of the business, owner(s) or corporate officers.

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.

This information collection request was reviewed and cleared by FNS Privacy Office, Deea Coleman, on 12/21/2023.

A12. Estimates of the hour burden of the collection of information.

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.

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.

An explanation of how the annual hour burden was estimated for each form in this collection is contained in the Burden Narrative (Appendix E). The estimated burden for this information collection including the number of respondents, frequency of response, average time to respond

and annual hour burden are shown in the attached Burden Table (Appendix F). A summary of the burden appears below.

Affected Public	Respondent Type	Description of collection activity	Form No.	Estimated Number of Respondents	Responses per Respondent	Total Annual responses	Estimated Hours Per Response	Estimated Total Burden Hours	Base Hourly Wage Rate	Fully-loaded Wage Rate	Total Annualized Cost of Respondent Burden
Farms, Businesses for or not for profits	SNAP Retailer, Farmers' Market, and Meal Service	Applications Received	252	1,438	1.0	1,438.0	1.50	2,157.0	37.02	49.24	106,203.35
		Applications Received	252-E	29,152	1.0	29,152.0	1.00	29,152.0	37.02	49.24	1,435,345.36
		Applications Received	252-FE	695	1.0	695.0	1.00	695.0	37.02	49.24	34,219.44
		E-Authentication ¹	252-E and 252-FE	29,847	1.0	29,847.0	0.13	3,980.1	37.02	49.24	195,941.97
		Applications Received	252-2	873	1.0	873.0	1.00	873.0	37.02	49.24	42,983.55
		Applications Received	252-C	5,945	1.0	5,945.0	0.25	1,486.3	37.02	49.24	73,177.90
		Store visits ²		39,330	1.0	39,330.0	0.17	6,686.1	37.02	49.24	322,745.91
		Reauthorization	252-R	17,543	1.0	17,543.0	0.25	4,385.8	37.02	49.24	215,939.42
Subtotal for Farm & Business				55,646	2.24	124,823.0	0.395	49,283.6			2,426,556.9
Federal	Military Commissaries	Applications Received	252-E	1	1.0	1.0	1.00	1.00	53.67	71.38	71.38
		Reauthorization	252-R	61	1.0	61.0	0.25	15.3	53.67	71.38	1,088.56
Subtotal for Federal Respondents				62	1.0	62.0	0.262	16.3			1,159.94
Grand Total				55,708	2.2	124,885.0	.395	49,299.9			2,427,716.84
1. Applications which require eAuthentication are not double-counted in the number of respondents.											

2. Respondents who receive store visits are the same respondents who submit various applications are not double-counted in the number of respondents.

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 SNAP Retailer, Farmers' Market, and Meal Service respondent cost is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2022 National Occupational and Wage Statistics, General and Operations Manager (11-1021) for Food and Beverage Retailers (4451 and 4452 only) (http://www.bls.gov/oes/current/oes_nat.htm). The hourly mean wage for functions performed by SNAP Retailer, Farmers' Market, and Meal Service applicants is estimated at \$37.02 per staff hour. We have adjusted this cost from the last submission based on an updated occupation code.

The estimate of Federal respondent cost is based on the burden estimates and utilizes the General Schedule for the Locality Pay Area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA, Effective January 2023, GS 13-1 (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/23Tables/html/DCB_h.aspx). The hourly mean wage for functions performed by military commissary applicants is estimated at \$53.85 per staff hour. The estimated annualized, fully loaded (x .33) cost to respondents is \$2,427,716.84. See table in A12A for details.

A13. Estimates of other total annual cost burden.

Provide estimates of the total annual cost burden to respondents or recordkeepers 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.

A14. Provide estimates of annualized cost to the Federal government.

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.

In FY 2023, FNS spent approximately \$7.7 million on store visits. The estimated annual re-occurring cost to the Federal government is \$2,761,627 for a grand total of \$10,461,627. FNS estimates that program specialists will review applications for ten percent of the total burden hours for respondents. The projection for total burden hours is 49,300 annually, so FNS projects 4,930 hours of application review annually. Based on the January 2023 General Schedule for the Locality Pay Area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA and GS 12 step 10 program analyst, (\$58.68/hour), the fully loaded (x .33) cost is \$78.04 per hour and \$384,759 total. FNS further estimates annual printing costs of \$32,333.33 for paper applications and authorization approval kits; annual assembly and mailing costs of \$80,000; annual form and approval kit storage costs of \$14,000; and \$2,250,535.14 annually for the Retail Service Center Contract.

FNS pays our contractor approximately \$171.87, on average, per store visit. We have a multi-year contract with a company to carry out these visits on behalf of FNS.

A15. Explanation of program changes or adjustments.

This is a revision of a currently approved information collection. The currently approved burden is 123,864 total annual responses and 19,887 total annual burden hours. This request reflects a decrease of -1,021 total annual responses and an increase of 29,413 total

annual burden hours. We expect program participation to increase, but because the previous submission double-counted respondents in who self-register for a Level 1 access account through the USDA eAuthentication system and respondents who receive store visits, the total number of respondents appears to decrease compared to the last submission. If the last submission had not double-counted respondents, it would have estimated a total of 53,731 annually, and FNS projects an increase of about 2,000 respondents to 55,708 annually (adjustment).

FNS projects that the estimated hours per response will increase from 0.16 hours (9.6 minutes) to .40 hours (23.7 minutes) due to adjustments. FNS has increased the estimated hours per response for store visits from 1 minute to 10 minutes and the estimated hours per response for the FNS-252-E, FNS-252-FE, and FNS-252-2 from 15 minutes to one hour. These adjustments more accurately estimate the response burden.

A16. Plans for tabulation, and publication and project time schedule.

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

This collection does not employ statistical methods and there are no plans to publish the results of this collection for statistical analyses.

A17. Displaying the OMB Approval Expiration Date.

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

A18. Exceptions to the certification statement identified in 83-I, Item 19.

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 the certification statement.