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October 15, 2018

Nicole Budzius
Chief, Retailer Administration Branch
Supplemental Nutrition Assistance Program
Retailer Policy and Management Division
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive, Room 422
Alexandria, VA 22302

**RE: Agency Information Collection Activities: Proposed Collection; Comment Request-
Supplemental Nutrition Assistance Program (SNAP), Store Applications, Forms
FNS-252, FNS-252-E, FNS-252-FE, FNS-252-R, FNS-252-2 and FNS-252-C**

Dear Chief Budzius:

On behalf of The Convenience Group, LLC, I write to express concerns with the U.S. Department of Agriculture's Food and Nutrition Service's (FNS) proposed application form used by retailers that wish to participate in the Supplemental Nutrition Assistance Program (SNAP or the Program). We are pleased that FNS is in the process of revising this application. The Convenience Group, however, remains concerned with questions in the proposed SNAP retailer application.

The Convenience Group is headquartered in Vancouver, Washington and operates 11 stores from Vancouver to Seattle. Of those stores, 10 participate in SNAP. We operate true neighborhood stores, which are important fixtures in the communities in which they are located. In several of those neighborhoods, if we did not redeem SNAP benefits, residents would have to travel by bus 3 to 5 five miles to just access food. We employ over 100 people in our stores. We are open from 18 hours to 24 hours per day. As true neighborhood stores, we give back to the communities where we reside; focusing on programs to alleviate hunger, providing nutritional education and working through various channels to disrupt the cycle of poverty.

The convenience store industry is one of the most competitive markets in the United States—and The Convenience Group operates on tiny margins. As such, we strive to serve our customers and only sell the products that they want to purchase. While our stores are convenient in terms of location and hours of service to all of our customers, we serve as an important access point to nutrition for many individuals on SNAP. We view our participation in SNAP as a public-private

partnership that allows us to serve the families that live in the communities where our stores are located. To participate in the Program, however, our company must account for a variety of costs and regulatory burdens. Our concern with the proposed SNAP retailer application is that it may exclude businesses like ours from participating in SNAP—even if we have met the legal and regulatory requirements of the Program.

To that end, The Convenience Group finds Question #21 concerning. By requesting the percentage of our company's sales that are from gasoline, FNS has emphasized gasoline (an item most frequently sold by convenience stores) as an ineligible item while ignoring ineligible items, such as pet food or office supplies, frequently sold by other retail industries like grocery stores. Furthermore, The Convenience Group understands that FNS needs to collect information on the percentage of foods cooked or heated on site given the SNAP retail eligibility regulations. FNS, however, should not ask retailers for the sales percentages of cold food sales prepared on site. For instance, The Convenience Group sells cold foods, including, but not limited to salads, sliced fruit and veggie trays, which are often sold for home consumption or preparation and prepared at our locations. These items are eligible for purchase with SNAP. In old applications, FNS simply asked for a percentage of sales for all ineligible items rather than breaking out these categories, which we find to be excessive.

Moreover, The Convenience Group finds Question #18 to be unclear. Retailers should be required to affirm they have seven varieties of each staple food group, which is the statutory requirement. Instead, FNS has asked retailers to indicate the exact number of items that are stocked or indicate that they stock 10 items on more per staple food category. This question leads retailers to believe that 10 items in each category are needed in order to participate in SNAP. It further implies a retailer who stocks extra items above the required seven items will get special consideration from FNS during the application process. Similar to Questions #19 and 20, The Convenience Group should be able to simply certify that we have the number of items required by law.

We sincerely hope that FNS will adjust the SNAP retailer application in light of our comments above so that the agency does not unintentionally make it more difficult for convenience stores like ours to participate in SNAP. The SNAP retailer application, as proposed, will create a hurdle for convenience stores to participate in the Program, which will harm the SNAP beneficiaries we serve. The Convenience Group and its predecessor has been a part of SNAP for approximately 50 years, and we hope to continue partnering with FNS. Participating in the Program not only allows us to serve our customers, but it enables us to provide the most vulnerable with access to nutrition.

Thank you for your consideration of our comments. Please do not hesitate to reach out for further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald Rhoads", with a stylized flourish at the end.

Donald Rhoads
President
drhoads@tcgstores.com