



June 8, 2017

Food and
Nutrition
Service

Park Office
Center

3101 Park
Center Drive
Alexandria
VA 22302

R. Timothy Columbus, Esq.
Steptoe & Johnson LLP
1330 Connecticut Avenue, NW
Washington DC, 20036-1795

Re: Response to FR Doc No: 2017-0004

Dear Mr. Columbus,

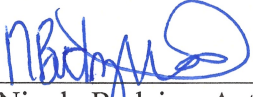
Thank you for your response to the Federal Register Notice requesting comments on the proposed information collection for the Store Application Forms FNS-252, FNS-252-E, FNS-252FE, FNS-252-R, FNS-252-2, and FNS-252-C in the Supplemental Nutrition Assistance Program (SNAP), published February 16, 2017. The Food and Nutrition Service (FNS) is committed to increasing integrity in the SNAP.

FNS appreciates your comments about the proposed information collection regarding the collection of financial institution information; data relating to a stores business and marketing practices; and an increased burden for retailers. FNS is mindful of the privacy and safeguarding of information provided on the SNAP retailer application and the burden associated with this information collection.

- The collection of financial institution information currently occurs at the SNAP point-of-sale service provider level for settlement purposes. FNS already collects information regarding the bank of record from retailers with adverse Program history or those operating locations that have violated SNAP rules. The collection of this information is a component of SNAP integrity and FNS is reinstituting collection of this data more broadly.
- The Agency makes every attempt to reasonably ensure the information collected and data stored on its servers are protected from theft and hackers. FNS certifies that the information collection complies with the Privacy Act of 1974.
- The revisions to the SNAP retailer applications were not finalized at the time the 60-day notice was published in the Federal Register. FNS is not adding the question regarding incentives from the final application forms.
- FNS determined an incorrect calculation was used in our initial estimation of burden hours. FNS increased the burden hours for this information collection from 1 to 11 minutes, to 1 to 19 minutes, on

average, per respondent. The bulk of the additional burden is related to asking questions in light of the regulatory changes to SNAP retailer eligibility requirements. The minor additional burden associated with collecting bank name and addresses are needed to ensure the benefits to program integrity. In addition, adding this information to the application form and associated electronic application will streamline data collection efforts.

Sincerely,



Nicole Budzius, Acting Chief
Retailer Policy and Management Division
Supplemental Nutrition Assistance Program
USDA – Food and Nutrition Service