



Food and  
Nutrition  
Service

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Retailer Policy and Management Division, SNAP  
RPMD Policy Memorandum 2018-01

OCT 13 2017

**SUBJECT:** Retailer Eligibility – Treatment of Applicant or Authorized Firm(s) Colocated with a Restaurant

Legislation: Food and Nutrition Act of 2008, Sections 3 and 9

Regulations: 7 CFR § 271.2 (definition of “retail food store”)

Rule: (FINAL) “Enhancing Retailer Standards in the Supplemental Nutrition Assistance Program (SNAP)” published on December 15, 2016, at 81 FR 90675

(PROPOSED) “Enhancing Retailer Standards in the Supplemental Nutrition Assistance Program (SNAP)” published on February 17, 2016, at 81 FR 8015

**IMPLEMENTATION DATE:** October 16, 2017

**OVERVIEW:** This memorandum clarifies policy related to implementation of the final rule, “Enhancing Retailer Standards in the Supplemental Nutrition Assistance Program (SNAP),” which amended the definition of “retail food store,” in SNAP regulations, at 7 CFR § 271.2, to say that, when multiple firms operating at the same location meet certain elements, FNS will consider them a single firm when determining eligibility for SNAP authorization.

**CLARIFICATION:** If FNS determines that multiple firms meet all four elements of colocation in the definition of “retail food store,” as provided in 7 CFR § 271.2, FNS must treat these firms as a single firm when determining eligibility for SNAP authorization. The four elements are met when the firms: (1) operate under one roof, (2) share ownership, (3) sell similar foods, and (4) share inventory.

If you have questions regarding this memorandum, please contact the Retailer Management and Issuance Branch at [RPMDHQ-WEB@fns.usda.gov](mailto:RPMDHQ-WEB@fns.usda.gov).

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