

C.E.N.T.S.less

Comprehensive Equitable National Transaction Standard

THE STANDARD AT A GLANCE

7 Control Objectives	3 Conformance Tiers	1 Governance Framework
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Legislation answers: **may we round?** This Standard answers: **how must we round to remain defensible?**

SEVEN CONTROL OBJECTIVES

	Objective	Requirement	Applies To
A	Deterministic Execution	Same inputs, same rule set, same output. Always. Reproducible from audit record alone.	All Tiers
B	Cash-Only Conditioning	Rounding applied exclusively to cash settlement. Electronic and EBT transactions settle exact.	All Tiers
C	Final Total Placement	Rounding occurs after all tax and fee computation. Pre-round total retained in audit record.	All Tiers
D	Protected Benefit Isolation	EBT/SNAP debit computed from pre-round SNAP-eligible total. Zero rounding delta to EBT under any condition.	Tier 2 + 3
E	Audit Logging	Tamper-evident records with cryptographic hash chain. Pre-round totals, deltas, rule set IDs retained. Seven-year minimum.	All Tiers
F	Bias Detection	Rolling 30-day and 90-day mean delta monitoring. Alert when deviation exceeds 50% of rounding increment.	Tier 2 + 3
G	Refund Normalization	Refund rounding mirrors original sale direction. Prevents systematic consumer-disadvantageous asymmetry.	All Tiers

THREE CONFORMANCE TIERS

Tier	Operator Profile	Assessment Requirement
Tier 1 Foundation	Single location. No EBT. One jurisdiction.	Self-assessment. Annual review. Rule set documentation required.
Tier 2 Compliant	Multi-location or any EBT/SNAP-accepting retailer.	Third-party assessment recommended. Quarterly bias review. EBT reconciliation mandatory.
Tier 3 Institutional	POS platform operator, high-volume, or multi-jurisdiction.	Third-party assessment required. Annual conformance statement. Independent hash chain verification.

THE EXECUTION GAP: BY THE NUMBERS

17/17 State Bills with Refund Gap <i>No state bill addresses return/refund rounding</i>	17/17 State Bills with Audit Gap <i>No state bill defines recordkeeping requirements</i>	0 Published Execution Standards <i>No federal or state agency has issued one</i>
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HOW THE STANDARD FITS THE LANDSCAPE



FRAMEWORK ALIGNMENT

NIST CSF 2.0 IDENTIFY / PROTECT / DETECT	AICPA Trust Services CC6, CC7, CC9 Criteria	Federal Reserve PSR Payment System Risk Policy
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Download the full Governance Standards Framework at centsless.com | Contact the Governance Working Group for assessment inquiries.

Statutory authority: FTC Act Sec. 5 | CFPB 12 U.S.C. 5531 | SNAP 7 U.S.C. 2011-2021 | 7 CFR Parts 274 and 278 | NIST FIPS 180-4