

Standardized Terms & Conditions of Approval

Telephonic Signature

Food and Nutrition Service (FNS) will allow State agencies to adjust:

1. Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.2(c)(7)(viii)(A).
2. SNAP regulations at 7 CFR 273.2(c)(7)(viii)(B) and 7 CFR 273.2(c)(7)(viii)(C).

Alternative procedure:

The State will not be required to create an audio recording of the client attestation or link that recording to the client case file. The State will summarize the information to which the household assents and allow a verbal signature from the client that is documented by the State. The documentation will include a case note in the State's eligibility system to demonstrate that the client has signed the application. The information the State documents in the case file must include the client's name, date and time of application, a summary of the information to which the client verbally assents, and the client's responses indicating agreement or disagreement. If a client submits an application without a signature and the State is able to connect with the client over the phone, the State will also note on the application that verbal attestation of the signature was given. The State is not required to amend its State Plan of Operation to indicate it is taking the telephonic signature option.

FNS is approving this adjustment subject to the following conditions:

1. A public health emergency declaration by the Secretary of Health and Human Services must be in place and the State must have issued an emergency or disaster declaration based on an outbreak of COVID-19.
2. The adjustment is limited to those households who submit an application over the phone or who have submitted a paper application without a signature;
3. Households will still be permitted to submit an application over the telephone with only name, address and signature to establish a filing date;
4. The State will continue to accept paper applications with signatures and online applications with electronic signatures (if available in the State);
5. The State will ensure that sufficient controls in their policy and automation are in place to implement the terms of this adjustment correctly, including a sufficient number of lines to accept calls and any necessary staffing changes to accept applications through the telephone;
6. The State will continue to comply with all other applicable interview and signature requirements;
7. The State will not accept an application without a signature, in accordance with 7CFR273.2(c)(7)(i);
8. The State will consult with their legal counsel to determine if this alternate approach constitutes a valid legal signature in their State; and the State agency has the capacity to provide to FNS the data required for evaluation of the caseload.
9. FNS reserves the right to revoke adjustments that are not being used appropriately to support an eventual transition to regulatory compliance and regular operations.

Quality Control (QC) Procedures:

No special QC procedures are required for cases subject to the provisions of this adjustment. Cases should be reviewed using standard review procedures contained in the FNS Handbook 310.

Evaluation Data Requirements for FFCRA Adjustments

- Within 45 days of the expiration, withdrawal, or termination of this adjustment, the State agency must provide to FNS the data and analysis listed below for the required evaluation:
 - Estimated number of households affected by this adjustment.
 - A narrative on the effect of program access and client satisfaction, including an analysis of any client or advocate complaints received related to the adjustment procedure.
 - A narrative on the effect of providing timely and accurate benefits.
 - A narrative on the effect of any other aspects of the eligibility process including the ability to manage caseload growth and the impact on administrative efficiency.

Emergency Declaration Requirements for FFCRA Adjustments

- The State WIMS user must attest to the presence of State-issued emergency declaration related to the COVID-19 pandemic at the time of request in order to implement an adjustment authorized by FFCRA.
- No adjustments may continue beyond the end of the month subsequent to the month in which the public health emergency declaration related to COVID-19 is lifted by the Secretary of Health and Human Services.