

SCOPE ■ State, County, Local

PROGRAM ■ Supplemental Nutrition Assistance Program (SNAP)

PRACTICE ■

State agencies should adopt processes to allow for telephonic signatures for Supplemental Nutrition Assistance Program (SNAP) applications and recertifications for use by state agency staff and third-party partners, such as community-based organizations that are contracted to help clients apply or recertify for SNAP.

WHY ■

Telephonic signatures:

- save time;
- decrease traffic in public benefit offices;
- simplify the application and recertification process; and
- more expeditiously connect clients to SNAP benefits.

The acceptance of a telephonic signature requires no face-to-face meeting and eliminates the need to mail documents in order to capture a client's ink signature. This can be especially helpful for those with time and transportation constraints, such as working households, rural residents, and older Americans.

By accepting telephonic signatures, SNAP agencies (as well as third-party application assisters) can help people use online SNAP application systems.

Another benefit of using telephonic signatures is the ability to streamline ongoing SNAP case management, including the processing of interim reports and recertifications.

BACKGROUND ■

A telephonic signature uses an individual's recorded verbal assent in place of a written (ink) signature. Telephonic signatures can be used for a range of SNAP transactions. For instance, states can adopt telephonic signatures for paperwork or verifications that are missing signatures. Facilitating necessary document completions can reduce delays in processing initial applications (whether submitted on paper, online, or by telephone), as well as reduce the number of cases that will be closing for procedural reasons rather than financial ineligibility (so-called "churn").ⁱ

While states have broad flexibility in developing their telephonic signature systems, states must meet certain requirements. The U.S. Department of Agriculture's Food and Nutrition Service has advised states that plan to implement SNAP telephonic signatures to do the following:

- Establish a retrievable record of the verbal assent of the household member and the information to which assent was given;
- Safeguard against impersonation, identity theft, and invasions of privacy;

- Preserve the right to apply in writing;
- Promptly provide the household a written copy of the completed application, with a simple procedure for corrections;
- Comply with bilingual service requirements; and
- Satisfy all requirements for a signature, with the date of the telephonic signature recording establishing the date of application. ⁱⁱ

The SNAP state agency must specify in its state plan of operation if it is selecting the telephonic signature option. ⁱⁱⁱ

State agencies may opt to implement a telephonic signature process with a third-party acting on behalf of the state agency (e.g., a community-based organization). To do so, the state agency must ensure that there is “orderly accessibility to the records in the contractor’s possession.” ^{iv}

Under this option, a third-party assistor — like a food bank — can complete an online application for a client over the phone, capture the client’s telephonic signature, and then submit the application for the client through the use of an electronic signature. This obviates the need to get the document to the client in person or by mail for inked signature and avoids additional delays in getting the application processed. The state — not a third party — still must then conduct the application interview with the client.

SPOTLIGHT

The [*Telephonic Signature in California Counties*](#) report provides an in-depth look at how the CalFresh (the state’s program name for SNAP) telephonic signature system, including model scripts and business practices, operates at the county level.

KEY STEP ■

Work with your state SNAP agency to make telephonic signatures available.

CHALLENGE ■

In California, the majority of counties that had not implemented the use of SNAP telephonic signatures pointed to a lack of clear guidance from the California Department of Social Services. Counties also cited barriers and challenges due to technological issues, financial costs, and legal concerns. ^v

LESSONS ■

The Los Angeles County Department of Public Social Services (LADPSS) implemented telephonic signatures for CalFresh in September 2017. The county allotted funds in the annual budget with state approval through an advanced planning document. LADPSS collaborated with the county’s Internal Services Department and stakeholders to plan, design, test, and implement its telephonic signature project. After implementing telephonic signatures, LADPSS reported, “The telephonic signature has enhanced the quality of customer service and improved the ease of the CalFresh application process and service delivery to all Los Angeles County customers. The telephonic signature also reduces the need for CalFresh applicants to visit district offices, thus reducing office lobby traffic.” ^{vi}

As more states and counties adopt telephonic signatures, more lessons are emerging. These can benefit states that are interested in implementing telephonic signatures statewide or would like to test them on a pilot basis for an area or particular population group. Statewide technology solutions and state-hosted learning opportunities also could help facilitate wider use of SNAP telephonic signatures. ^{vii}

TIP

A telephonic signature is just one type of alternative to an ink signature. Advocates should be aware of other signature alternatives to a handwritten signature, such as a gesture or visual signature. ^{viii} Many state online SNAP applications incorporate an electronic signature feature (e.g., typing in your name or signing the screen with a stylus). ^{ix}

RESOURCES

- Federal Register, [Supplemental Nutrition Assistance Program \(SNAP\): Eligibility, Certification, and Employment and Training Provisions of the Food, Conservation and Energy Act of 2008 — Final Rule](#), January 6, 2017;
- U.S. Department of Agriculture, Food and Nutrition Service: [SNAP Telephonic Signature Guidance](#) (memo), May 12, 2014;
- Alliance to Transform CalFresh and County Welfare Directors Association of California, [Telephonic Signature in California Counties](#), April 2016;
- SF Marin Food Bank, [Modernizing the CalFresh User Experience](#), May 2016;
- Kansas Legislature, 2017–2018 Legislative Sessions, [History of SB 95](#),

enacted April 12, 2017 (adopting implementation of telephonic signatures for public assistance benefits); and

- Kansas Food Bank President and CEO Brian Walker’s [Letter of Support of Sub SB 95](#), March 20, 2017 (supporting SNAP telephonic signature).

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For more on ending hunger, read FRAC’s [A Plan of Action to End Hunger in America](#).

ENDNOTES

ⁱ SF Marin Food Bank. (2016). *Modernizing the CalFresh User Experience*. Available at: <http://www.sfmfoodbank.org/wp-content/uploads/2016/10/FINAL-REPORT-Modernizing-the-CalFresh-User-Experience-6.14.2016-1.pdf>. Accessed on May 10, 2019.

ⁱⁱ U.S. Department of Agriculture, Food and Nutrition Service. (2014). *SNAP Telephonic Signature Guidance* (memo). Available at: <https://fns-prod.azureedge.net/sites/default/files/SNAP%20Telephonic%20Signatures%20Policy%20Memo.pdf>. Accessed on May 10, 2019.

ⁱⁱⁱ See 7 CFR § 273.2 (c)(7)(viii) at: <https://www.law.cornell.edu/cfr/text/7/273.2>. Accessed on May 10, 2019.

^{iv} U.S. Department of Agriculture, Food and Nutrition Service. (2014). *SNAP Telephonic Signature Guidance* (memo). Available at: <https://fns-prod.azureedge.net/sites/default/files/SNAP%20Telephonic%20Signatures%20Policy%20Memo.pdf>. Accessed on May 10, 2019.

^v Alliance to Transform CalFresh and County Welfare Directors Association of California. (2016). *Telephonic Signature in California Counties*. Available at: <http://transformcalfresh.org/wp-content/uploads/2016/05/Telephonic-Signature-in-California-Counties-Survey-Results-2016-1.pdf>. Accessed on May 10, 2019.

^{vi} Sylvester, M. (2018). National Association of Counties Achievement Award Entry. Available at: <https://members.naco.org/FileUpload/Awards/Storage/2018/107352/2018 NACo Telephonic Signature for CalFresh Application.pdf>. Accessed on May 10, 2019.

^{vii} Alliance to Transform CalFresh and County Welfare Directors Association of California. (2016). *Telephonic Signature in California Counties*. Available at: <http://transformcalfresh.org/wp-content/uploads/2016/05/Telephonic-Signature-in-California-Counties-Survey-Results-2016-1.pdf>. Accessed on May 10, 2019.

^{viii} Federal Register. (2017). *Supplemental Nutrition Assistance Program (SNAP): Eligibility, Certification, and Employment and Training Provisions of the Food, Conservation and Energy Act of 2008 — Final Rule*. Available at: <https://www.federalregister.gov/documents/2017/01/06/2016-30663/supplemental-nutrition-assistance-program-snap-eligibility-certification-and-employment-and-training>. Accessed on May 10, 2019.

^{ix} U.S. Department of Agriculture, Food and Nutrition Service. (2016). *Accepting SNAP Applicant and Client Signatures Electronically* (memo). Available at: https://fns-prod.azureedge.net/sites/default/files/snap/Electronic_Signatures_Memo.pdf. Accessed on May 10, 2019.