



General Information System (GIS) Message

Section 1

Transmittal:	24DC068 Upstate and New York City
Date:	October 11, 2024
To:	Subscribers
Suggested Distribution:	Supplemental Nutrition Assistance Program (SNAP) Directors Temporary Assistance (TA) Directors
From:	Valerie Figueroa, Deputy Commissioner, Employment and Income Support Programs
Subject:	Extension of SNAP and Temporary Assistance Telephonic Signature Administrative Waiver
Effective Date:	Immediately
Contact Information:	SNAP Policy Bureau at (518) 473-1469 or SNAPBureau@otda.ny.gov ; Temporary Assistance Bureau (518) 474-9344 or tabureau@otda.ny.gov
Attachments:	N/A

Section 2

The purpose of this GIS is to advise social services districts (districts) that the United States Department of Agriculture (USDA) Food and Nutrition Services (FNS) has approved New York State’s Administrative waiver request to allow for modified telephonic signature procedures for SNAP applications filed over the telephone or submitted without a signature **through June 30, 2026**. During this time, telephonic signatures for Public Assistance (PA), SNAP or Medicaid (MA) on PA case applications will also be accepted, pursuant to the guidelines set forth below.

Federal regulations under 7 CFR 273.2(c)(viii)(B) and (C) provides the regulatory requirements for telephonic signature, including capturing an audio recording of the household’s verbal assent, with access to the audio file via the case record.

In response to the COVID-19 public health emergency, USDA allowed temporary adjustments to these procedures as outlined in [20 TA/DC049](#), including documenting the household’s consent in case notes as an alternative to capturing an audio recording. Those modified procedures remained in effect through June 30, 2024, as outlined in [23DC049](#).

USDA, under authority granted in 7 CFR 272.3(c)(1)(i), is allowing for an administrative waiver to continue the use of these adjusted procedures for a two-year period because it would result in more effective and efficient administration of the program.

This directive reiterates the alternate procedures allowed for recording telephonic signatures for SNAP-only applications; and PA, SNAP or MA on a PA case applications, filed over the telephone or submitted without a signature. These alternate procedures simplify and streamline the technology requirements for districts and will allow more flexibility in assisting households who require telephone-based assistance.

Section 3

Districts choosing to implement telephonic signature must adhere to the guidelines described below, and must use the OTDA program-specific scripts attached to [20 TA/DC049](#).

- Read the entire application to the telephone applicant. Additionally, the district must read the program-specific OTDA script (SNAP-only applications, or PA, SNAP or MA on PA case applications) and obtain a verbal consent from the applicant, which shall be documented by the district as set forth below.
- Document, in the case record: (1) that the applicant was read the entire application, verbally attested to the information provided on the application, and that the applicant has signed the application; (2) the applicant's name, date and time of application; (3) a summary of the information to which the applicant verbally assents; and, (4) the applicant's responses indicating agreement or disagreement.
- If an applicant submits an application without a signature and the district can connect with the applicant over the telephone, the district must also note on the application that verbal attestation of the signature was given as well as the date and time that the verbal attestation of signature was given. For PA cases, as required in the PA, SNAP, or MA on a PA case script, the verbal assent of both the applicant and the applicant's spouse must be obtained and noted on the application. The application filing date is the date that the verbal signature was obtained.
- All telephone applicants must be provided with a written copy of their completed application (LDSS-2921 or LDSS-4826 or local equivalent) with instructions for a simple procedure for correcting any errors or omissions.
- PA, SNAP or MA on a PA case applicants in Rest of State (ROS) should be provided with a second copy of the application with instructions that the applicant and all applying adults must apply an ink signature (a "wet signature") on all signature lines and return the signed application to the district within 30 days.
- PA, SNAP or MA on a PA case applicants in New York City should be provided with an *Authorization To Repay Public Assistance Benefits From Retroactive SSI* [W-148A] with instructions that the applicant and all applying adults must sign the form(s) and return the signed form(s) to the New York City Department of Social Services within 30 days.

- It is recommended that any mailing to the household that requires the return of information should include a self-addressed, stamped envelope so that the household can easily return the information to the district.
- If more than 30 days passes and the district has not received the required signed application or the New York City W-148A (as applicable), the district must determine, on a case-by-case basis whether good cause exists for the household's failure to return the signed document. If it does, the application may be approved if otherwise eligible and the district must obtain (for example, by home visit) a signature on the applications as soon as it is practicable. If good cause for failure to return the signed document does not exist, the application must be denied.
- This telephonic signature process will be limited to those households who submit an application over the telephone or who have submitted a paper application without a signature.
- For SNAP only, households will still be permitted to submit an application over the telephone with only name, address and signature to establish a filing date. If the applicant signature is not set forth on the consent and authorization page the district would need to get a second verbal signature prior to the issuance of benefits.
- Districts must continue to accept paper applications with signatures and online applications with electronic signatures.
- Districts must ensure that sufficient controls are in place for policies and automated processes to implement the terms of the telephonic signature waiver correctly, including maintaining enough telephone lines to accept calls and a sufficient number of staff to accept applications by telephone.
- Districts must continue to comply with all other applicable program interview and signature requirements.
- Districts will comply with the provision of any data required for evaluation of telephone applications. The script is based on the expectation that the applicant will complete the application, that the worker will be reading and reviewing all the information required on the LDSS-2921 or LDSS-4826 with the applicant and reading to the applicant all the notices, assignments, authorizations, consents, and penalty warnings in such application and reviewing the Rights and Responsibilities as contained in the Rights and Responsibilities booklet LDSS-4148B.

Any district that elects to use the telephonic signature waiver must notify their program-specific liaison. At the end of the two-year waiver period, participating districts must report to OTDA:

- The estimated number of households affected by this waiver
- Any operational issues or household complaints received because of this waiver.

Please reach out to your SNAP or TA program liaison with any questions.