



Question & Answer

SNAP: Telephonic Signature Waiver Webinar

This Q&A document is designed to provide information regarding the temporary waiver of the SNAP Telephonic Signature requirement during the COVID-19 Pandemic. Under this waiver, Colorado can document in case comments that a client verbally attested to the information provided on their application or recertification. This waiver is valid March 1, 2020 through May 31, 2020.

Question	Answer
<i>What if I'm not in the office, who will mail this (application) out?</i>	Please follow your county's current mailing process for sending out mail to SNAP customers during the COVID-19 pandemic.
<i>Is this done before we accept the application as unsigned or we accept as unsigned and honor that date and then proceed with this process?</i>	If a county receives an unsigned SNAP application, the county should reach out to the household and attempt to obtain a telephonic signature. A SNAP application/RRR "received date" is the date the application is signed.
<i>For Optional Process: we would be able to accept Apps and RRR's over the telephone or Apps only?</i>	This waiver includes SNAP applications and SNAP RRRs for both obtaining a signature for an unsigned SNAP app or SNAP RRR and for completing a new SNAP app or SNAP RRR over the phone.
<i>Will there be more ads or info released to the public about the MyCOBenefits app available on Android and Apple? Applying through the app requires a signature</i>	At this time, we do not anticipate any additional advertisements going out to the public regarding the MyCOBenefits app. Applying through MyCOBenefits for SNAP does require a signature. During the implementation of this waiver, counties should continue to accept SNAP applications through MyCOBenefits, PEAK, mail, drop box, walk-in, etc.
<i>Are RRRs acceptable unsigned?</i>	No. SNAP RRRs must be signed to be considered valid because they are a type of application.. Keep in mind that this waiver changes our definition of "signed" to include telephonic signatures.
<i>It's my understanding that there is no expectation of recording the telephonic signature or retaining any recordings if the county does record it. Correct?</i>	Correct. This waiver temporarily removes the requirement of storing a digital recording of a SNAP household's verbal signature.



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<p><i>Could you provide a case comment template for unsigned applications and applications over the phone?</i></p>	<p>Unsigned SNAP Applications:</p> <ul style="list-style-type: none"> ● Type of unsigned SNAP application received by the county: <ul style="list-style-type: none"> ○ New SNAP Application ○ SNAP RRR ● The date and time of the verbal attestation ● Name of the the person that gave the verbal attestation signature ● Reference to the “Telephonic Signature Waiver” <ul style="list-style-type: none"> ○ Possible verbiage here could be: <i>“In accordance with the SNAP Telephonic Signature Waiver, the household’s application is now considered signed.”</i> <p>SNAP Applications taken over the phone:</p> <ul style="list-style-type: none"> ● Client’s name ● Date of application ● Time of application ● Summary of the information to which the client verbally assents - as follows: <ul style="list-style-type: none"> A. Confirm that the household wants to apply for SNAP. B. Confirm the identity of the applicant by asking for the name, date of birth, and Social Security Number if applicable. C. Confirm with the client that they will receive a copy of the application they are filling out today, and that that copy will contain a section titled “What I Should Know,” which the client is responsible to review. D. Attest that under penalty of perjury, to the best of their knowledge, the information provided on the application is correct. ● Indicate whether the client said “Yes” or “No” to the above bullet points.
<p><i>This waiver ends 5/31/2020. Based on current and continued concerns, can it be extended?</i></p>	<p>Yes, as of right now the waiver is good through 5/31/2020. Based on the status of the public health emergency due to the pandemic, SNAP will reassess and communicate any changes as necessary.</p>
<p><i>How about the lawful presence signature?</i></p>	<p>EBD has created an electronically-fillable LP affidavit. It is embedded in the electronically-fillable SPA. Additionally, we encourage the use of the DMV interface as often as possible.</p>



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<i>Why isn't it an issue that the technician doesn't go over the What I Should Know portion of the application before the client signs it? The client needs to know what they are signing at the time of application.</i>	Please reference slide 15 in the presentation. In capturing the household's assent telephonically, the county must notify the applicant that all information on the application must be true under penalty of perjury; additionally, the client is notified that the "What I Should Know" section of the application will come to them in the mail and it is the client's responsibility to read and understand it. However, if the county is uncomfortable with this process, the county may always choose to read the entirety of the "What I Should Know" to an applicant at the time of the telephonic application.
<i>Are there any updates about disaster relief Food Assistance in CO?</i>	This pandemic does not meet the requirements for D-SNAP. FNS will not be approving D-SNAP.
<i>So we send the application back to the client just so they just have a copy, correct?</i>	Correct. Regulations within this waiver indicate the following: <ul style="list-style-type: none"> • A physical copy of the SNAP application completed with the household over the phone must be sent to the customer using postal mail. • A copy of the physical SNAP application completed with the household over the phone must be saved in the county's work management system.
<i>Will approval of using this for cash programs come from CDHS or do we start now?</i>	Please start using this right away.
<i>There are not attachments for the fillable application</i>	The electronically-fillable applications have been sent out via an email communication to all CBMS End Users. Please note, these electronic applications were not meant to be customer facing, so please do not post publicly.
<i>For those customers that we communicate with via email, can we use the email communication as the verbal signature?</i>	No. An email communication cannot be used as a telephonic signature for SNAP.
<i>MA applications are currently not accepted over the telephone and not part of this waiver, correct?</i>	That is correct. HCPF is in discussion with its Federal partners to see how it can implement something similar. Nothing is confirmed yet. We will keep everyone up to date as more information becomes available.
<i>Has there been any discussion with HCPF?</i>	Yes, HCPF is also in discussion with their Federal partners to see how they can implement something similar. Nothing confirmed as of yet and we will keep everyone up to date as more information becomes available.



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<i>I was under the impression from the last waiver webinar that income could be verified via client statement currently? Based on this webinar it sounds like that is not the case?</i>	The last waiver webinar (about waiving SNAP interviews) did state that the county should use Prudent Person Principle (PPP) when determining income in some circumstances (for example, when an applicant reports that their employment has ended or been terminated, the county worker can and should use PPP about employer closures in their community to move forward with an eligibility determination). If a SNAP applicant has ongoing sources of income, or the termination is questionable in some way, the client's statement will not be acceptable. With any specific questions regarding this idea, please contact CDHS_SNAP_Team@state.co.us .
<i>Is LEAP included for telephonic signature?</i>	LEAP began to accept telephonic signatures starting this season. However, LEAP is different from SNAP or cash because the applicant must go through the Heat Help Hotline at 1.866.432.8435 to file the application over the telephone. LEAP does require storing the verbal signature for 3 years plus the current year and their contractor, Heat Help, is able to meet that requirement. Technicians at the county level cannot obtain a telephonic signature for LEAP, but they can refer the applicant to Heat Help.
<i>In the first use case of using a telephonic signature to make up for the lack of a signature - if a customer leaves a voicemail message with all the required info, is that usable information to provide the telephonic signature, or does this have to be?</i>	SNAP does not consider a voice message left for the county to be a valid telephonic signature. However, if you experience a specific instance in which it seems that a client has left a voicemail that contains all the pieces of the required attestation information, please reach out to CDHS_SNAP_Team@state.co.us for guidance on how to proceed.
<i>Just to make clear, no other program applications may be accepted through this method, is that correct?</i>	At this time, SNAP and cash applications can be accepted through this method.
<i>Can we leave a message to a voicemail that does not identify the person we attempted to call? Client name not in VM or another name populates in VM not associated with case. Does SNAP agree for us (counties) to still leave a message (in event unable to contact)?</i>	Please reference voice message instructions on slide 7 of the presentation. A message like the provided example does not pose any confidentiality concerns. There is no requirement that the client has identified themselves on their voicemail message.



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<i>Can you clarify the statement made that black square (in application) is not required?</i>	When a SNAP application is accepted over the phone, the applicant must be asked every SNAP-required question on the application. Questions on the SPA application marked with a solid black square are questions not required by SNAP.
<i>Since you mentioned this can be used for cash, does this count as an interview?</i>	For cash programs, it would be acceptable for the technician to complete the interview at the time of obtaining the telephonic signature. The technician would need to ensure that all required interview information was covered (in addition to reviewing/responding to the mandatory questions on the application itself).
<i>What is the effective date of the application if the form is received on a different date than the signature attestation?</i>	The date the signature is obtained is the date of the application.
<i>Regarding waiting for 24 hrs before the second call: We have a process in place already for cold calling (we leave a message saying we will call back in next 15 minutes) - can we use the same process to obtain the signature instead of waiting 24 hours?</i>	Yes, you can use that existing process to capture the signature.
<i>Can we use the SOF instead of the PDF for clients on the phone?</i>	No. The “Statement of Facts” does not serve as a copy of a SNAP application. Therefore, it cannot be used in the place of a PDF/paper version of the SPA.

More Questions? Email us:

SNAP Policy: cdhs_snap_team@state.co.us

Cash Policy: cdhs_emplbendiv@state.co.us

Staff Development Center (SDC): soc_staffdevelopment@state.co.us

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