

## STATE WAIVER REQUEST

### Recording of Supplemental Nutrition Assistance Program (SNAP) Applicant Signatures Over the Telephone

1. **Type of request:** Initial
2. **Primary citation:** 7 CFR §273.2(c)(7)(viii)(A), 7 CFR §273.2(c)(7)(viii)(B), 7 CFR §273.2(e)(7)(viii)(C)
3. **State:** District of Columbia
4. **Region:** MARO
5. **Requirements:**
  - 7 CFR §273.2(c)(7)(viii)(A) requires State agencies that choose the option to accept telephonic signatures to specify in their State plans of operation that they have taken the option
  - 7 CFR §273.2(c)(7)(viii)(B) requires that to constitute a valid telephonic signature, the State agency's telephonic signature system must make an audio recording of the household's verbal assent and a summary of the information to which the household assents. An example of a telephonic signature is a recording of “Yes” or “No”, “I agree” or “I do not agree”, or otherwise clearly indicating agreement or disagreement during an interview over the telephone.
  - 7 CFR §273.2(c)(7)(viii)(C) requires that a telephonic signature system must provide for linkage from the audio file of the recorded verbal assent to the application so that the State agency has ready access to the household's entire case file.
6. **Proposed alternative procedures:** The District of Columbia (District) is requesting temporary flexibilities to ensure households with limited or no access to the internet can complete an initial application for SNAP over the telephone.

District residents unable to complete an application through the District’s online fillable form and who are not able to download and print an application from the District’s website, may complete the application over the telephone. The eligibility worker will complete the attestations via adequate case narration in place of a wet or electronic signature. Specifically, the District will verbally summarize the information to which the applicant assents and allow a verbal signature from the applicant that is documented by the District in the applicant’s case notes in the eligibility system. The information an eligibility worker documents in the case file will include the applicant’s name, date and time of application, a summary of the information to which the client verbally assents, and the applicant’s responses indicating agreement or disagreement.

For District residents that submit a paper application without a signature, eligibility workers will reach out to the applicant over the phone to obtain a verbal signature from the applicant. The information an eligibility worker documents in the case file will include the applicant's name, date and time of application (which will be the date and time of the signature), a summary of the information to which the client verbally assents, and the applicant's responses indicating agreement or disagreement.

The District will continue to accept applications via fax and mail. In addition, at this time applications are still being accepted in-person at our Service Centers.

#### **7. Justification for request:**

- The Secretary of Health and Human Services declared a Public Health Emergency under section 319 of the Public Health Service Act as a result of COVID-19 retroactive to January 27, 2020.<sup>1</sup>
- The Mayor of the District of Columbia declared a Public Emergency and a Public Health Emergency as a result of the COVID-19 effective March 11, 2020 and extended on March 20, 2020.<sup>2</sup>
- On March 24, 2020, the Mayor of the District of Columbia ordered the temporary closure of non-essential business and prohibition of gatherings of 10 or more people effective March 25, 2020 and expiring April 24, 2020.<sup>3</sup>
- On March 30, 2020, the Mayor of the District of Columbia ordered a stay-at-home order under penalty of fine or imprisonment effective April 1, 2020.<sup>4</sup>

As a result of the COVID-19 pandemic, resulting Mayoral orders in place, and increase in COVID-19 positive tests<sup>5</sup> in the District, access to SNAP under normal District operating procedures has presented barriers for both customers and workers. Under normal operating procedures, the majority of SNAP customers in the District visit one of our five (5) Service Centers. While our service centers remain open to allow residents to pick up and drop off applications/documents, we have seen a significant decrease in new applications and visits to the office due to social distancing guidelines. In addition, the percentage of staff coming into the Service Center or Call Center is around 35% each day.

As a result, the District has implemented a way for applicants to submit applications and verifications online. However, many District households do not have broadband internet access. For example, 45-48% of households in Wards 7 and 8<sup>6</sup> have no broadband internet instead relying on their phones to access the internet. Residents that do have access to the internet and are able to print an application at home may

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<sup>1</sup> Source: <https://www.phe.gov/emergency/news/healthactions/phe/Pages/2019-nCoV.aspx>

<sup>2</sup> Source: <https://mayor.dc.gov/sites/default/files/u23/Mayor%60s%20%20Order%202020-50.pdf>

<sup>3</sup> Source:

[https://coronavirus.dc.gov/sites/default/files/dc/sites/mayormb/release\\_content/attachments/Mayor%27s%20Order%202020-053%20Closure%20of%20Non-Essential%20Businesses%20and%20Prohibiti....pdf](https://coronavirus.dc.gov/sites/default/files/dc/sites/mayormb/release_content/attachments/Mayor%27s%20Order%202020-053%20Closure%20of%20Non-Essential%20Businesses%20and%20Prohibiti....pdf)

<sup>4</sup> Source:

[https://mayor.dc.gov/sites/default/files/dc/sites/coronavirus/release\\_content/attachments/Mayor%27s%20Order%202020-054%20Stay%20at%20Home.pdf](https://mayor.dc.gov/sites/default/files/dc/sites/coronavirus/release_content/attachments/Mayor%27s%20Order%202020-054%20Stay%20at%20Home.pdf)

<sup>5</sup> Source: <https://coronavirus.dc.gov/page/coronavirus-data>

<sup>6</sup> Source: <https://greaterdc.urban.org/blog/new-data-reveal-digital-divides-across-dc-neighborhoods>

still need to visit a local retailer to pick an envelope and stamps in order to mail the application putting the applicant and those they may come into contact with at risk.

Beginning the week of April 6, 2020 District operations will temporarily transition to a virtual service and call center model to allow eligibility workers to process cases at home and communicate with applicants and ongoing households through the call center. The supplement of additional workers to answer calls will provide the capacity to assist any customers who need to complete an application over the phone. Even after the transition to a virtual service model, the District plans to keep Service Centers opened as long as possible with minimal staff to continue allowing residents to pickup and drop-off applications.

The District is committed to ensuring all eligible District residents can obtain food assistance through SNAP, including those without internet access, in a way that aligns with District directives to stay at home and reduce person-to-person contact.

- 8. Anticipated Impact on Households and State Agency Operations:** The District does not anticipate any negative impact on overall agency operations.

Providing another access point for District residents to apply for SNAP will help ensure families have the ability to purchase food during this public health crisis.

- 9. Affected Caseload:** This waiver would apply to any District residents who calls to apply for SNAP benefits. There is no data available on this population.

- 10. Anticipated implementation date and time period for which waiver is needed:** The District is requesting that this waiver be effective on approval and for the duration of the federal COVID-19 Emergency Declaration and District of Columbia State of Emergency and a Public Health Emergency related to COVID-19, ending only after all of these emergency declarations have concluded.

- 11. Proposed quality control review procedures:**  
The requested waiver does not require any special quality control review procedures.

- 12. State agency submitting waiver request and State contact person:**

Anthea Seymour  
Administrator  
Economic Security Administration  
Department of Human Services  
District of Columbia Government  
64 New York Ave, NE, 6<sup>th</sup> Floor  
Washington, DC 20002  
(202) 698-3906  
[Anthea.Seymour@dc.gov](mailto:Anthea.Seymour@dc.gov)

**13. Signature and Title of Requesting State Agency Official:**

A handwritten signature in cursive script that reads "Anthea Seymour" followed by a horizontal line.

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Title: Administrator, Economic Security Administration,  
Department of Human Services,  
District of Columbia Government  
Email for transmission of response: [Anthea.seymour@dc.gov](mailto:Anthea.seymour@dc.gov)

**14. Date of request:**  
**April 2, 2020**