

## Waiver Request

1. **Waiver serial number:**
2. **Type of request:** Initial
3. **Primary regulation 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)
4. **Secondary regulation citation:** N/A
5. **State:** Virginia
6. **Region:** MARO
7. **Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.2(c)(7)(viii)(A) require State agencies that choose the option to accept telephonic signatures to specify in their State plans of operation that they have taken the option.

Regulations at 7 CFR 273.2(c)(7)(viii)(B) require 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.

Regulations at 7 CFR 273.2(c)(7)(viii)(C) require 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.

8. **Proposed alternative procedures:** Virginia will not create an audio recording of the client attestation or link that recording to the client case file. Virginia 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 Virginia Case Management System (VaCMS), the State's eligibility system, to demonstrate that the client has signed the application. The information the State documents in the case file will 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.
9. **Justification for request:** Due to the COVID-19 Public Health Emergency, almost all of Virginia's local offices are closed to the public and working with reduced staff. SNAP applications increased from 6,425 the week ending March 21, 2020 to 12,681 the week ending April 4, 2020. This waiver will enable a

streamlined method of application to the public and is consistent with what is practicable under actual conditions in areas affected by the COVID-19 Public Health Emergency.

10. **Anticipated impact on households and State agency operations:** This waiver will allow households to receive benefits more timely and make agency operations more efficient. In February 2020, there are 333,669 households and 679,702 individuals certified to receive SNAP benefits in Virginia.
11. **Anticipated Implementation date:** Upon approval of this waiver.
12. **Quality control procedures:** There are no changes to the Quality Control procedures for cases subject to the provisions of this waiver.

13. **Signature and title of requesting official:**

*Toni Blue Washington*

Toni Blue Washington  
Director  
Division of Benefit Programs

14. **Date of request:**

15. **State agency staff contact (name/email/telephone):**

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16. **Regional office contact person (to be completed by FNS regional office):**

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