

SNAP & Medicaid Telephonic Signature Toolkit

Applying for SNAP and Medicaid by phone is a vital access point for many low-income households and the community-based organizations that assist them. However, not all states offer a phone application, while others still require phone applicants to take the additional step of mailing and returning a signed paper form. This paper-based process creates administrative burdens for agencies and delays access to benefits for eligible individuals.

The solution to this challenge is a telephonic signature, which is a recorded or documented assent of the information provided during a phone application that can be used in place of a written signature.

This toolkit is designed to help state and county agencies, advocates, and other stakeholders implement telephonic signatures for SNAP and Medicaid to reduce administrative burden, improve access to benefits, and support more equitable service delivery.

Contents

Background.....	1
Why Telephonic Signatures Matter for States	2
Planning for Implementation of Telephonic Signatures.....	3
Step 1: Identify the “Why”	3
Step 2: Understand the Legal and Regulatory Framework	6
Step 3: Assess State Readiness and Capacity	10
Step 4: Technology and Infrastructure Needs	12
Step 5: Develop Operational Procedures.....	15
Step 6: Monitor, Evaluate, and Improve	17
Examples of State and County Telephonic Signature Systems	20

Background

Implementing telephonic signatures for SNAP and Medicaid is a strategic opportunity to advance equity, efficiency, and access in public benefit programs. Telephonic signatures can reduce administrative burden, streamline enrollment, and remove barriers for individuals who face challenges with traditional application methods. They are especially critical for reaching underserved populations, including those who lack reliable internet access, face transportation difficulties, or have limited availability to apply in person due to work schedules or caregiving responsibilities.

This toolkit provides a roadmap for states to assess their readiness, build the necessary infrastructure, and design client-centered telephonic signature systems. It offers actionable steps to navigate legal, technological, and operational considerations. In doing so, it draws on lessons learned and best practices from the SNAP Telephonic Signature Implementation Cohort, launched in 2023.

The cohort's purpose was to identify the needs of each state, implement customized solutions, and facilitate learning and problem solving. The participating states were diverse in geography, methods of program administration, degree of program integration, and technical capacity. This work paused briefly when Benefits Data Trust closed and resumed in January 2025 with support from the Center on Budget and Policy Priorities and funding from the AARP Foundation. Despite this interruption, states were able to make steady progress toward their goals. While the cohort's focus was SNAP, their experiences can inform telephonic signature implementation in Medicaid as well.

Why Telephonic Signatures Matter for States

Telephonic signatures play a critical role in improving equitable access to SNAP and Medicaid benefits by reducing barriers for individuals who face challenges with other application methods. Telephonic signatures offer a number of advantages not only for clients but also for the state and county agencies that administer these programs, including:



- **Operational efficiency.** Telephonic signatures can streamline application processing by minimizing paperwork and reducing delays associated with mailing physical documents. In SNAP, a phone application can also serve as the required interview, if conducted by merit staff. This efficiency translates into reduced foot traffic in public benefit offices, allowing staff to focus more on processing cases timely and accurately and direct client support.



- **Improved client experience.** The simplified process of a telephonic signature makes it easier for clients to complete their application, which can increase satisfaction and participation rates. By accelerating the connection to critical food and health assistance, telephonic signatures help ensure that clients receive the support they need in a timely manner.



- **Streamlined SNAP interviewing.** Certain SNAP procedures, such as on-demand interviews and texting or cold-calling clients, can reduce missed appointments and increase enrollment. Telephonic signatures can enhance these strategies by enabling the client to complete their application and interview in one step.¹ States that implement telephonic signatures may experience reduced churn as a result.²



- **Program sustainability.** Telephonic signatures may reduce costs and offer a more sustainable model for program administration. They can lower expenses for printing, mailing, and in-person services and enable agencies to reallocate resources toward higher-impact activities. While offering in-person services continues to be an important part of program operations, telephonic signatures can cost-effectively extend the reach of the program.

Planning for Implementation of Telephonic Signatures

Implementing a telephonic signature process for SNAP, Medicaid, or other programs requires a phased, strategic approach. The following steps provide a roadmap for states to assess readiness, build the infrastructure, and launch effective systems.

Step 1 Identify the “Why”

Adding telephonic signatures to your state operations can reduce administrative burden, improve access to benefits, and support more equitable service delivery. It will help to begin the process by considering your motivation and goals, as well as which programs and people you would like to involve.

Questions to consider

What are the main reasons your state might consider implementing telephonic signatures?

What are your top five goals, in rank order, for telephonic signature implementation (for example: reducing churn, improving access and customer service, and/or streamlining operations)?

Goal 1

Goal 2

Goal 3

Goal 4

Goal 5

Which programs do you wish to include in your state's telephonic signature process, and why?

	Include? (yes/no)	Rationale
SNAP		
MAGI Medicaid		
Non-MAGI Medicaid		
TANF		
Other		

Will telephonic signatures be used by state staff, community-based organizations, or both?

Step 2 Understand the Legal and Regulatory Framework

The federal legal and regulatory requirements that govern the implementation of telephonic signatures in SNAP and Medicaid are outlined below. State agencies should also consult legal counsel to ensure that their telephonic signature systems meet any additional state standards.³

The processes and requirements for SNAP and Medicaid telephonic signatures are relatively aligned, except that Medicaid requires an audio recording of the telephonic signature, whereas in SNAP, states can request a waiver to capture the telephonic signature via a note in the case file.

SNAP

The Food and Nutrition Act of 2008⁴ provides a state option to allow clients to use a telephonic signature on their SNAP applications as an alternative to a wet (ink) signature or an electronic signature. Initially, this could only be accomplished by creating a retrievable audio recording of the client's verbal assent and a summary of the information to which the household assents. During the COVID-19 pandemic, states needed to quickly shift operations to meet changing needs on the ground. In response, the Food and Nutrition Service (FNS) of the U.S. Department of Agriculture allowed states to use an alternative method: documenting the verbal assent by writing a note in the case file. This method is now available to states on an ongoing basis via a Telephonic Signature waiver.⁵

To use telephonic signatures in SNAP, states must:⁶

- specify in the state plan of operation that it has selected this option;
- make signature files retrievable and clearly linked to the application or case in some way (if using an audio recording);
- preserve the right to apply in writing;
- promptly provide applicants with a written copy of their completed application along with a simple procedure for requesting any corrections; and
- comply with bilingual service requirements.

In 2024, FNS issued guidance clarifying that multiple signatures are not necessary, noting that the state "must not require an applicant to re-sign the application, such as requiring a 'wet' signature or an electronic signature, in addition to a valid telephonic signature."⁷ The guidance goes on to explain that "[i]f an applicant submits a joint application for multiple programs and telephonically signs for the purpose of the other program, the signature is valid for SNAP if it includes the required audio recording, or the state has an approved SNAP waiver to record the signature through another method." In this guidance, FNS also recommends as a best practice for phone applications that states first ask for name, address, and a telephonic signature prior to requesting other information.

FNS has also indicated in multiple guidance documents that third parties, such as community-based organizations, are able to use these same telephonic signature processes when assisting clients in

applying for SNAP benefits. States must continue to ensure that the telephonic signature records are readily accessible to state staff if needed.

Medicaid

The relevant federal statute and regulations⁸ require that states provide individuals with multiple application channels for Medicaid, including phone applications, and that states have a process in place for accepting telephonic signatures. Federal regulations also require that Medicaid beneficiaries be able to submit their renewals through any of the modes required for an initial application.⁹

Guidance from the Centers for Medicare & Medicaid Services (CMS)¹⁰ recommends that states follow these principles for administering telephonic applications:

- have a process in place to accept a telephonic signature at the time clients choose to apply over the phone;
- be able to provide a copy of the completed application to the client, upon request; and
- provide confirmation of the submitted application to the client by email or paper mail.

CMS waived the requirement to record and store telephonic signatures for both Medicaid applications and renewals during the “unwinding” process, but discontinued these waivers after June 30, 2025.¹¹ In late 2024, CMS issued additional guidance for states regarding telephonic signatures at renewal that covered how to handle incomplete telephonic renewals, storage requirements for telephonic renewals, and also made it clear that states can partner with managed care plans to collect telephonic signatures.¹²

Questions to consider

Legal & Risk Management

What is the legal definition of a valid signature in the state? Are there any specific requirements that are important to account for?

Are there other state laws that may impact telephonic signature implementation – for example, in areas such as cybersecurity and data storage?

Capturing a telephonic signature:

- How will the state capture the telephonic signature: as an audio recording or via a case note? Note that if the signature will also be used in Medicaid, an audio recording is required, whereas either option works for SNAP.
- Has legal counsel been consulted to ensure telephonic signature meets any state requirements?

Establishing a retrievable record of the verbal assent and the information to which assent was given:

- What systems and processes will be in place to ensure the signature is properly stored or captured and can be easily retrieved for audits?

Preserving the right to apply in writing:

- How will you ensure staff and clients are aware of options to apply in writing?

Promptly providing the client with a written copy of the completed application, with a simple procedure for corrections:

- What will be the process for providing a completed copy of the application?
- What system or capacity limitations can you expect to encounter?
- What process will staff follow if corrections are received?

Complying with bilingual service requirements:

- How will your state offer telephonic signatures for multiple languages?
- What barriers might you encounter?

Including telephonic signature provisions in the state SNAP plan of operations:

- What is the process for updating the SNAP plan of operations in your state?

Step 3 Assess State Readiness and Capacity

Before implementing telephonic signature systems for SNAP and Medicaid, states should conduct a comprehensive assessment to evaluate their readiness and identify potential barriers. This foundational step ensures that technological, operational, and client-facing components are aligned with federal requirements and state capacity. A structured assessment allows agencies to tailor their approach based on existing infrastructure, staffing, and partnerships, while also highlighting areas that may require additional investment or support.

Questions to consider

Technology

Does the state have any existing infrastructure to record and store audio recordings, whether for quality assurance (QA) or other purposes?

Audio Recording or Verbal Assent Captured Via Case Note?

Which option makes the most sense for your state, given the programs you have selected and other operational considerations?

Operations & Oversight

Which existing processes and platforms could be used to train staff on telephonic signature processes?

What QA measures are currently in place for application processes and/or call center operations? How can those be used to conduct QA for phone applications involving telephonic signatures?

Client Experience

How can clients be informed about the availability of telephonic signature and the ability to complete an application or renewal over the phone?

How is language assistance currently provided to clients? How could this be used for telephonic signature processes?

Community-Based Organization (CBO) Involvement

Do any current or potential CBO partners have secure recording and storage capabilities that could be leveraged to capture telephonic signatures?

Are there contracts in place with CBOs that address compliance requirements or that could be updated to incorporate these requirements?

Step 4 Technology and Infrastructure Needs

States should adopt robust technological and data management practices to ensure secure and efficient implementation of telephonic signatures. This includes deploying call recording or interactive voice response (IVR) systems to securely capture telephonic signatures. Each audio file must be associated with the corresponding application record to maintain data integrity and facilitate retrieval. Strong file-naming conventions should be established to support organized storage, while secure systems are needed to protect sensitive information. Additionally, states should plan for long-term storage and retrieval of audio files to meet federal audit and verification requirements.

Careful planning and exploration are necessary to be sure the necessary technology is available. At the beginning of the Telephonic Signature Implementation Cohort, states expected that the additional option of verbal assent recorded by case note for SNAP would eliminate technological burdens associated with audio recordings but soon discovered a new set of challenges. For example, one state found that they did not have the infrastructure or resources to update their system to generate the required copy of the completed application for the client.

Questions to consider

Using call recording software or IVR systems to capture and store verbal signatures securely:

Have you researched software and IVR systems?

What are the associated costs?

What are the pros and cons of various systems?

Are there systems currently being used in your state to which audio recordings could be added?

Ensuring logical association between the recorded signature and the application:

What processes will be put in place to ensure the audio recording is associated with the submitted application?

Are there search mechanisms in place for case numbers, dates, and other key information?

Planning for long-term storage and retrieval of audio files for audits or verification:

Do the systems and software in place allow for long-term storage?

What are the cost considerations?

What is needed to ensure both federal and state-specific storage requirements are followed?

Step 5 **Develop Operational Procedures**

Strategic partnerships will be critical to the long-term success of telephonic signatures. With input from stakeholders, states should establish operational processes that provide clarity internally and in communications with clients. This will require dedicated time and project management. Before a full rollout, states should pilot small-scale implementation to refine workflows and build internal support.

Foster Strategic Partnerships

To build effective and sustainable telephonic signature systems, states should foster strategic partnerships that will support implementation and long-term success. Collaboration with counties and local offices is essential to ensure alignment on technology platforms and operational processes. Stakeholder engagement across all departments that may be impacted by process changes is necessary to identify practical challenges and outline sensible workflows. Internal stakeholder areas for consideration include policy, operations, quality control, technology, legal, key program staff, and/or vendors. Additionally, engaging community-based organizations to assist with application intake and signature collection can expand reach and improve access for underserved populations. To safeguard data and maintain compliance, states should formalize these partnerships through contracts that clearly outline responsibilities, ensure secure data handling, and guarantee accessibility of signature records when needed.

Develop and Document Clear Processes and Procedures

States should develop processes and procedures, in partnership with relevant stakeholders, that outline roles and responsibilities, step-by-step instructions and scripts, and any references to relevant tools and policies. Steps should be broken down in sequential order for easy-to-follow instructions, including visual aids as necessary. The final product should be vetted back through the original stakeholders to ensure accuracy and understanding. Additionally, all procedures should be thoroughly documented for both state agencies and third-party partners to ensure alignment, accountability, and continuity across all entities.

Communicate Effectively With Clients

Agencies should provide straightforward instructions about telephonic signature options so that clients understand how to complete applications remotely. Support should be offered to meet bilingual service requirements and ensure that language is not a barrier to access. Telephonic signatures are especially valuable for clients with limited internet connectivity or transportation, helping to reduce barriers to enrollment. These efforts should be integrated into broader outreach strategies, including the use of text messaging and proactive referrals to other programs.

Dedicated Time and Project Management

States often encounter multiple competing priorities. Dedicated time and project management is essential for an initiative like implementing telephonic signatures to keep moving forward.

Pilot Small-Scale Implementation

Before implementing telephonic signatures statewide, states should consider piloting small-scale implementation to test workflows, identify operational challenges, and gather feedback from staff and clients. Pilots offer a low-risk environment to refine scripts, technology, and procedures, while building internal support and confidence. Lessons learned during the pilot phase can inform broader rollout strategies and help ensure smoother, more effective implementation across agencies and partner organizations.

Questions to consider

Identifying strategic partners:

Who are the key stakeholders inside and outside of government who will need to be engaged to implement telephonic signatures effectively?

Meeting client needs:

What instructions and language supports will clients need to complete phone applications using a telephonic signature?

How can the state meet those needs?

Planning a pilot:

How can the state test out components of the telephonic signature at a smaller scale?

Step 6 Monitor, Evaluate, and Improve

States should implement a structured approach to monitoring and evaluation to ensure continuous improvement and accountability in telephonic signature systems. Key performance metrics should be tracked regularly to assess system effectiveness. These include application completion rates, processing times, and client satisfaction. Gathering feedback from both clients and staff will help identify pain points and areas for refinement. Additionally, conducting routine quality control checks and sharing lessons learned across teams will foster a culture of learning and support the incorporation of best practices.

Questions to consider

Deciding what you want and need to know:

What do you hope to accomplish by adopting telephonic signatures?

How will you monitor the new system to determine if problems are occurring and allow for continuous improvement?

What data do you want to be able to share with others?

Identifying specific outcomes to evaluate:

How will you assess impacts on clients, state staff, and community-based partner organizations?

Which programmatic outcomes will you track? Options include but are not limited to:

- shortened time to complete the application process
- reduction in procedural denials and churn
- increased enrollment of underserved populations

Selecting metrics to track these outcomes:

Which metrics will you use? Options include but are not limited to:

- client/employee/partner satisfaction
- number of phone applications and renewals (partial/incomplete vs. completed)
- phone application approval/denial rates with denial reasons compared to other application types
- characteristics of applicant households
- time to complete applications and renewals
- days an application/renewal is open/pending before a final determination is made

Anticipating and addressing data challenges:

What data are readily available?

What data will be difficult to access and who could help overcome that challenge?

Examples of State and County Telephonic Signature Systems

Across the country, several states and counties have successfully implemented telephonic signature systems. They offer valuable models for replication and adaptation.

California counties such as **Los Angeles, San Francisco, and San Bernardino** have adopted interactive voice response (IVR) systems and call recording software to streamline the collection of telephonic signatures. These systems allow for the secure capture and storage of verbal assent, which is then logically associated with the application file. These practices have reduced office traffic and improved service delivery, according to the Los Angeles County Department of Public Social Services.¹³

Florida has implemented a collaborative model involving the Departments of Elder Affairs and Children and Families, working alongside Area Agencies on Aging. These agencies use IVR systems to record telephonic signatures, enabling remote application assistance for older adults and individuals with mobility challenges.¹⁴

In **Pennsylvania**, a partnership between the Department of Public Welfare and local nonprofits facilitates the recording of full phone calls using call recording software. These recordings are securely stored by the nonprofit and made available to the SNAP agency upon request.¹⁵ This model demonstrates how third-party organizations can play a critical role in extending the reach of telephonic signature systems while maintaining compliance with federal guidelines.

Wisconsin has taken a more targeted approach by recording only the signature portion of phone calls. The Department of Human Services uses specialized software to store these recordings, ensuring they are retrievable and linked to the corresponding case files. This method balances efficiency with legal compliance and data security.¹⁶

In **San Diego County**, California, community-based organizations assist clients with SNAP applications and record telephonic signatures using call recording software. The audio files are uploaded through their internal system and transmitted to the county where staff review the recordings, convert them to a PDF format, and store them in a document repository.¹⁷ This process can ensure both accessibility and accountability.

By learning from these models, other states can adopt telephonic signature systems that reduce administrative burden, improve access to benefits, and support more equitable service delivery.

-
- ¹ CBPP and CLASP, “Improving SNAP and Medicaid Access: SNAP Interviews.” November 30, 2018, <https://www.cbpp.org/research/food-assistance/improving-snap-and-medicaid-access-snap-interviews>.
 - ² Food Research & Action Center, “Best Practices for SNAP Telephonic Signatures,” May 2019, <https://frac.org/wp-content/uploads/BP-Telephonic-Signature-FINAL-002.pdf>.
 - ³ Tricia Brooks, “Federal Medicaid Policy on Electronic Signatures,” Georgetown University Health Policy Institute Center for Children and Families, March 2011, https://ccf.georgetown.edu/wp-content/uploads/2012/03/Federal%20medicaid%20policy_electronic_signatures.pdf.
 - ⁴ 7 U.S.C. §11(e)(2)(C)(ii).
 - ⁵ The memo from USDA FNS dated August 15, 2022 outlining the availability of this waiver is no longer available on the USDA website. However, the availability of this waiver is referenced in the following resource – Food and Nutrition Service, U.S. Department of Agriculture, “SNAP Multiple Online Applications and Telephonic Signatures,” June 7, 2024, <https://www.fns.usda.gov/snap/multiple-online-applications-and-telephonic-signatures>.
 - ⁶ 7 U.S.C. §11(e)(2)(C)(ii); 7 CFR 273.2(c)(7)(viii).
 - ⁷ Food and Nutrition Service, U.S. Department of Agriculture, “SNAP Multiple Online Applications and Telephonic Signatures,” June 7, 2024, <https://www.fns.usda.gov/snap/multiple-online-applications-and-telephonic-signatures>.
 - ⁸ 42 U.S.C. § 18083(b)(1)(A); 42 CFR 435.907.
 - ⁹ 42 C.F.R. § 435.916(b)(2)(i)(B).
 - ¹⁰ Centers for Medicare & Medicaid Services, U.S. Department of Health and Human Services, “What are the expectations for states in implementing telephonic applications as required by the statute at section 1413(b)(1)(A) and regulations at 42 CFR 435.907?” March 28, 2018, <https://www.medicaid.gov/faq/2020-04-10/92156>.
 - ¹¹ Centers for Medicare & Medicaid Services, U.S. Department of Health and Human Services, “Use of Unwinding-Related Strategies to Support Long-Term Improvements to State Medicaid and Enrollment Processes,” November 14, 2024, <https://www.medicaid.gov/federal-policy-guidance/downloads/cibe1411142024.pdf>.
 - ¹² Centers for Medicare & Medicaid Services, U.S. Department of Health and Human Services, “Medicaid and Children’s Health Insurance Program Requirements for Providing, Prepopulating and Accepting Eligibility Renewal Forms,” December 20, 2024, <https://www.medicaid.gov/federal-policy-guidance/downloads/cib-12202024.pdf>.
 - ¹³ Food Research & Action Center, “Best Practices for SNAP Telephonic Signatures,” May 2019, <https://frac.org/wp-content/uploads/BP-Telephonic-Signature-FINAL-002.pdf>.
 - ¹⁴ Rachel Meeks Cahill, “Telephonic Signatures: An Essential Tool for Enrollment,” Bifocal: A Journal of the ABA Commission on Law and Aging, Vol. 34, No. 6, July-August 2013, <https://www.americanbar.org/content/dam/aba/publications/bifocal/BIFOCALJuly-August2013.pdf>.
 - ¹⁵ *Ibid.*
 - ¹⁶ *Ibid.*
 - ¹⁷ “Telephonic Signatures: The Whole Truth,” 211 San Diego, <https://www.cdss.ca.gov/calfreshoutreach/res/pdf/2-1-1%20SD%20Tele-Sign%20Presentation.pdf>.