



Date: June 7, 2024

Subject: Supplemental Nutrition Assistance Program – Multiple Online Applications and Telephonic Signatures

To: All State Agencies  
All Regions

This memorandum expands on the [Online Application Policy](#) clarification memorandum issued February 15, 2024, and clarifies existing policy relative to multiple online applications for the same household and telephonic signatures.

### Multiple Applications

The requirements explained in the memorandum [Handling Multiple Applications Submitted by the Same Household](#) issued December 30, 2009, are still applicable. The [Agricultural Act of 2014 \(section 11\(e\)\(2\)\(B\)\(iv\)\)](#) and SNAP regulations at [7 CFR 273.2\(b\)\(1\)\(v\)](#) require States to review each submitted application and evaluate its impact on a household's eligibility and benefit level. Eligibility systems and program policies must comply with these requirements.

States have flexibility on how to link multiple applications in the eligibility system. States can have case workers manually review and file multiple paper applications in the case record and link them for processing. Alternatively, States can program eligibility systems to search for pending or open cases and link multiple online applications automatically. Once the eligibility system has linked the cases, States can process the application as described below:

- Prior to Eligibility Decision: States have two options when applicants submit applications when an eligibility determination is still pending:
  - States may choose to append the additional applications to the originally submitted application. If a State chooses this option, it must append all subsequent applications to the earliest received application to preserve the original application's filing date. The State must document the impact of any changes on eligibility and benefit level in the case file. FNS encourages States to select this option.
  - States may choose to deny the additional applications; however, States should clearly explain on the denial notice that this was a procedural denial and explain the reasoning for the procedural denial in plain language. The State should explain in its notice of eligibility that the original application is still pending, and that the household's eligibility is determined using the original application and any supplemental information received prior to the eligibility decision. Because of the potential for miscommunication, FNS does not recommend this option.

- After Eligibility Decision: Under the provisions of [7 CFR 272.4\(e\)](#), States must deny any application received after the household has been determined eligible and is actively receiving benefits. Additionally, States must review these additional applications and act on any reportable changes. If the State determined the household was ineligible on the original application, the State must act on any new application that the household submits after the date of the denial notice, provided that it contains a name, address, and signature.

States must retain any duplicate applications in the household's case record whether submitted prior to or after an eligibility decision.

### Telephonic Signatures

It is increasingly common for States and community partners to assist applicants with completing SNAP applications by asking questions over the telephone and recording the applicant's responses into the application form. Under the provisions of [7 CFR 273.2\(c\)\(7\)\(viii\)](#) the State may accept telephonic signatures. To constitute a valid telephonic signature, the State must make an audio recording of the household's verbal assent and link the audio recording to the case file. It is the State's responsibility to ensure this meets the legal definition of a valid signature in their State. See [Questions and Answers Concerning SNAP: Eligibility, Certification, and Employment and Training Provisions](#) issued May 3, 2017, for additional information.

For States that do not have the technology to make and link an audio recording of the telephonic signature, securing the client's signature can present an obstacle. This delays the filing date since a signature is required. To assist with this, FNS recently advised States of the availability of two waivers of the telephonic signature. While similar, one waiver is for State personnel and the other is for community partners assisting with completing and filing applications. Under both waivers, the person assisting with the application is allowed to record the telephonic signature through a means other than creating an audio recording of the client's attestation. The State must document the telephonic signature in the case record.

Below are important reminders for any State that chooses to accept telephonic signatures, regardless of whether they operate with an audio recording or under a waiver:

- **Documentation and Attestation**: The State employee or community partner is not "signing" for the applicant or acting as an authorized representative. They are simply documenting the household's telephonic signature which attests to the information on the application.
- **Multiple Signatures Not Necessary**: 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. If 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.

While a copy of the completed application must be sent to the household for review and corrections, the telephonic signature constitutes a valid signature for the purpose of establishing a filing date, for any application filed with a name, address, and signature.

As a reminder, individuals have a right to file an application with name, address, and signature even when applying over the telephone. See [Online Application Policy](#) clarification memorandum issued February 15, 2024, for more details. As a best practice, States who take applications through a telephonic process should ask for name, address, and document a signature prior to asking an individual for all other needed information.

States should contact their [FNS regional office](#) representatives with any questions. Regional offices should work with States to provide technical assistance and ensure compliance with program requirements.

Moira Johnston  
Acting Director  
Program Development Division  
Supplemental Nutrition Assistance Program