

NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

JOSH STEIN • Governor

DEV DUTTA SANGVAI • Secretary

YVONNE COPELAND • Director, Division of Child and Family Well-Being

July 17, 2026

Dear County Directors of Social Services

Attention: Food and Nutrition Services Managers and Supervisors
Subject: Extension of Telephonic Signature Waiver and Consolidated Guidance
Priority: For Information and Action
Expiration: June 30, 2028

I. General Information

The United States Department of Agriculture (USDA) has approved a two-year extension of North Carolina's Telephonic Signature Waiver, effective July 1, 2026, through June 30, 2028. Under this waiver, county staff may continue to accept telephonic signatures for Food and Nutrition Services (FNS) applications and recertifications by documenting the client's verbal attestation in writing instead of creating an audio recording of that attestation.

This letter consolidates all telephonic signature guidance into one comprehensive letter. It supersedes all prior guidance on telephonic signatures, including Dear County Director Letter EFS-FNSEP-44-2021 and the telephonic signature provisions of EFS-FNSEP-21-2023, EFS-FNSEP-22-2023, EFS-FNSEP-10-2024, and EFS-FNSEP-12-2024.

This waiver remains in effect through June 30, 2028 and then expires. If the USDA extends the waiver beyond this date, a new letter will be issued.

II. What the Waiver Covers

The waiver applies to:

- FNS applications completed by telephone; and
- FNS recertifications completed by telephone.

The waiver does not change the following:

- Households may still submit an application with only a name, address, and signature (including a telephonic signature) to establish a filing date.
- Continue to accept all other types of signatures, including handwritten and electronic signatures.
- Never accept an application or recertification that has no signature of any kind.

III. Telephonic Signature Steps

Complete the following steps each time a client signs by telephone:

1. Verify the client's identity using standard verification questions.

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LOCATION: 1915 Health Services Way, Raleigh, NC 27607
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www.ncdhhs.gov • TEL: 919-707-5659 • FAX: 984-236-8205

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2. Inform the client of their rights and responsibilities, including the penalties for providing false information, and select the applicable check boxes.
3. Review with the client a summary of the information the client provided for the client's verbal approval.
4. If the client's response indicates agreement with the summary, select the Signature Received Over The Phone check box, then submit the application or recertification. If the client disagrees with any part of the summary, note the disagreement and correct the information the client disputes.

Note: If the telephonic signature is obtained after the application has already been submitted in NC FAST, record it by selecting the Phone Signature Consent check box on the Edit Details screen of the Income Support Application.

5. Promptly provide the client a written copy of the completed application or recertification, with instructions for correcting errors or omissions. This step is a federal condition of the waiver and applies to every telephonic signature. Document the client's name and the date and time of the application or recertification on the signature line of the DSS-8207 or DSS-2435. For NC FAST guided interviews, the name, date, and time are already captured in the application record, so no separate case note is required. The completed form or guided interview serves as the summary of information and the client's responses.

IV. Unsigned Applications and Recertifications

When an unsigned DSS-8207 or DSS-2435 is received, make at least one attempt to contact the household by telephone if a telephone number is available.

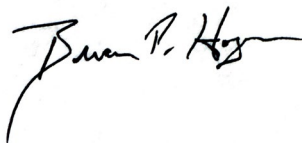
- **If you reach the household:** complete the interview (if one is required) and record the telephonic signature using the steps in Section III.
- **If you cannot reach the household:** for applications, return the signature page per FNS 405, Applicant Responsibilities; for recertifications, return the DSS-2435 with a DSS-8650 per FNS 505, SR Recertifications Requirements. The application or recertification is not filed until the household returns a signed form or completes a telephonic signature.

V. Quality Control and Client Complaints

Cases with telephonic signatures are subject to standard quality control review; the documentation in Section III is what demonstrates a valid signature. Report any client complaint, verbal or written, related to telephonic signatures in a case note in NC FAST, and to the Continuous Quality Improvement Specialist (CQIS) at dss.policy.questions@dhhs.nc.gov. USDA requires the State to report complaint counts before the waiver can be extended again.

If you have any questions regarding this information, please send them to the Continuous Quality Improvement Specialist (CQIS) at dss.policy.questions@dhhs.nc.gov.

Sincerely,



Brian Patrick Hogan
Deputy Director for Nutrition

Division of Child and Family Well-Being

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