

Kristin Robbins
State Representative
District 37A



Minnesota
House of
Representatives

August 28, 2026

Commissioner Tikki Brown
Minnesota Department of Children, Youth, and Families
Attention: Data Request
444 Lafayette Road
St. Paul, MN 55155

Via electronic delivery

Dear Commissioner Brown,

I am writing regarding the Department of Children, Youth, and Families' August 18 announcement that Minnesota requested and received approval from the U.S. Department of Agriculture to extend the state's SNAP Telephonic Signature Waiver, also referred to as the Verbal Signature Waiver, through June 30, 2028.

As described by DCYF, the waiver allows county and Tribal Nation office support staff and eligibility workers to accept verbal signatures on SNAP applications, renewals, and recertification forms without creating an audio recording of the household's attestation. Instead, the worker documents the verbal signature in the case record.

I understand the goal of reducing administrative burdens and delays for eligible households. At the same time, eliminating the audio record raises questions about how the state verifies the identity of the individual providing the verbal signature, confirms the information provided, and resolves any disputes regarding attestation.

To better understand Minnesota's use of the waiver and the safeguards in place, please provide the following information since Minnesota began accepting unrecorded verbal signatures for SNAP applications in 2020:

- 1) Please describe the procedures counties and Tribal Nations use to verify the identity and address of an applicant or authorized representative before accepting an unrecorded verbal signature. Please include:
 - a) What information must be verified;
 - b) How identity is authenticated;
 - c) Whether the address provided by the caller is independently confirmed – if so, how; and
 - d) What steps are taken if a mailed application is returned as undeliverable or the household later disputes information recorded in the application.
- 2) Please explain what controls are in place to prevent or detect use of verbal signatures to sign-up false identities or ineligible recipients when no audio recording exists to independently document the attestation.
- 3) Please provide, by year, the number of SNAP applications, renewals or recertifications that are completed every year, broken down by how many are completed by physical or electronic signature, audio-recorded telephonic signature or unrecorded verbal signature. Please provide this data back to 2018.
- 4) How were SNAP applications, renewals or recertifications verified prior to the waiver allowing unrecorded verbal signatures in 2020?

- 5) For initial SNAP applications using the waiver, please provide the number processed under regular SNAP procedures and the number processed under expedited service procedures.
- 6) Please identify how many SNAP applications using the waiver also involved an application for, renewal of, or participation in another public assistance program, including Medical Assistance, MFIP/TANF, WIC, or other cash or food assistance programs.
- 7) Please identify whether DCYF is aware of cases involving an unrecorded verbal signature that subsequently raised concerns involving suspected fraud, identity theft, or an intentional program violation, and whether the absence of an audio recording has complicated an investigation, appeal, or administrative proceeding. Please provide the number of documented occurrences of these complications.
- 8) Please provide a copy of Minnesota's current waiver request and USDA's approval, including any conditions or program-integrity safeguards associated with the waiver, and briefly explain the state's rationale for seeking the extension through June 30, 2028.

Thank you for your attention to this request and for your assistance in helping me better understand how the waiver is being implemented in Minnesota. I look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristin Robbins", with a stylized flourish at the end.

Representative Kristin Robbins

Chair, Fraud Prevention and State Agency Oversight Policy Committee

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