



JB Pritzker, Governor

Illinois Department of Human Services

Grace B. Hou, Secretary

April 28, 2020

Julie Mikkelson, SNAP Director
USDA Food and Nutrition Service
77 West Jackson Street, 20th Floor
Chicago, IL 60604-3591

Dear Ms. Mikkelson,

The Illinois Department of Human Services (DHS) is submitting a request to waive federal regulations found at 7 CFR 275.12(c) and 7 CFR 275.14(b) as it relates to quality control field investigation interviews and Comparison 1.

It is proposed that the requirement of a personal interview and completion of Comparison 1 be temporarily suspended and that the Active review methodology temporarily align with the "Negative Action Record Reviews" methodology wherein the Active review becomes a desk review with possible contact with the household or a collateral contact.

Increasingly, individuals will be finding it more challenging due to the current economy to maintain a home or cellular phone for communication. This challenge will only increase over time as the health crisis continues. Furthermore, as businesses which have been forced to close during this economic downturn are relied upon to provide corroborative verifications, the likelihood of receiving verifications for the sample month has and will continue to decrease substantially. The adoption of these temporary measures will result in an increase in completion rates and thus lessen the chances for a higher payment error rate due to impact of regression.

By suspending the regulatory requirements of a personal interview and obtaining sample month's verifications, and temporarily adopting the "Negative Action Record Reviews" methodology, the likelihood of being able to complete reviews will increase significantly. Adopting this methodology will maintain the integrity of SNAP QC reviews, allow for the continuity in the measurement of errors and ultimately result in the more accurate reporting of a fiscal year error rate.

Sincerely,

Grace B. Hou
Secretary, Illinois Department of Human Services



JB Pritzker, Governor

Illinois Department of Human Services

Grace B. Hou, Secretary

Cc: Tim Verry
Leslie Cully
Terri Vaniter
Tara Parcels

STATE WAIVER REQUEST

1. Waiver serial number (if request is extension):

2. Type of request: Initial

3. Primary regulation citation: 7 CFR 275.12(c) Field Investigation

4. Secondary regulation citation, if any: 7 CFR 275.14(b) Reviewing Process

5. State: Illinois

6. Region: Midwest

7. Regulatory requirements:

7 CFR 275.12(c)(1) Field investigation states in part that, “The field investigation will include interviews with the head of household, spouse, or authorized representative; contact with collateral sources of information; and any other materials and activity pertinent to the review of the case.”

7 CFR 275.14(b) Reviewing process states in part that, “The reviewer shall follow the procedures outlined in the Quality Control Review Handbook, FNS Handbook 310, to conduct quality control reviews.”

As it relates to interviews:

- The FNS 310 Handbook states in part in section 213, “During the field review, the reviewer must interview the household or, when appropriate, the authorized representative and obtain verification from collateral contacts.”

As it relates to Comparison 1:

- The FNS 310 Handbook states in part in section 214.1, “There are two applicable QC error threshold comparisons.”
 - The QC verified allotment for sample month is compared to the authorized allotment (Comparison I)
- Further, the FNS 310 Handbook states in part in section 621, “Comparison I. The first comparison is of an allotment computed based on the actual, verified sample month circumstances for items the household is entitled to have considered in the benefit calculation to the authorized allotment.”

8. Proposed alternative procedures: It is proposed that the requirement of a personal interview and completion of Comparison 1 be temporarily suspended and that the Active review methodology temporarily align with the “Negative Action Record Reviews” methodology wherein the Active review becomes a desk review with possible contact with the household or a collateral contact.

9. Justification for request: There will be significant impact on the QC review process as a result of the current health crisis if certain regulatory requirements are not waived. As such, we request in the interest of maintaining social distancing the temporary suspension of the requirement to complete a personal interview. Increasingly, individuals will be finding it more challenging due to the current economy to maintain a home or cellular phone for communication. This challenge will only increase over time as the health crisis continues.

Additionally, we request the temporary suspension of obtaining ‘sample’ month verifications due to the vast number of businesses which have been forced to close during this economic downturn. As these businesses are relied upon to provide corroborative verifications the likelihood of receiving verifications for the sample month has and will continue to decrease substantially.

A further result of a state’s inability to complete a personal interview and/or obtain corroborative verifications during the health crisis will be, a decrease in a state’s completion rate. The adoption of these temporary measures will result in an increase in completion rates and thus, lessen the chances for a higher payment error rate due to impact of regression.

Again, we believe that by temporarily suspending the regulatory requirements of a personal interview and obtaining sample month’s verifications, and temporarily adopting the “Negative Action Record Reviews” methodology, the likelihood of being able to complete reviews will increase significantly. Adopting this methodology will maintain the integrity of SNAP QC reviews, allow for the continuity in the measurement of errors and ultimately result in the more accurate reporting of a fiscal year error rate.

10. Anticipated impact on households and State agency operations: For some households, the cessation of the possibility of having their benefits discontinued for refusing to cooperate with SNAP QC reviews. For State agencies, none.

11. Caseload information, including percent, characteristics, and quality control error rate for affected portion: NA

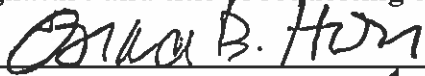
12. Anticipated implementation date and time period for which waiver is needed: Immediate implementation for reviews conducted for the sample months of March, April and May.

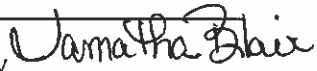
13. Proposed quality control review procedures: Please see above

10. State agency submitting waiver request and State contact person:

Illinois Department of Human Services
Division of Family and Community Services
Bureau of SNAP Integrity
Tara Parcels, Bureau Chief

11. Signature and title of requesting official:



Name/Title: Grace B. Hou, Secretary 

Email for transmission response: leslie.k.cully@illinois.gov

12. Date of request: April 28, 2020

13. State agency staff contact (name/email/telephone): tara.parcels@illinois.gov
Ph. 217-785-8110

14. Regional office contact person: