



Food and Nutrition  
Service

April 20, 2020

1320 Braddock Place  
Alexandria, VA  
22314

Grace B. Hou  
Secretary  
Department of Human Services  
100 South Grand Avenue, East  
Springfield, Illinois 62762

RE: SNAP – Illinois Request to Adjust Good Cause Timeframe for Failure to  
Provide Social Security Number (SSN) Due to COVID-19 – Approval

Dear Ms. Hou:

This letter transmits approval of the Illinois Department of Human Services (DHS) request (Adjustment # COV-076) to adjust 7 CFR 273.6(d) in order to allow a household member who has good cause for failing to provide a Social Security Number (SSN) to participate in the Supplemental Nutrition Assistance Program (SNAP) for longer than the application month and one additional month. FNS is approving this request under authorization of section 2302 of the Families First Coronavirus Response Act (P.L. 116-127).

The State agency may extend the timeframe for an individual to participate in SNAP after having established good cause for failure to provide a SSN for up to an additional three months. This will allow the State agency to grant good cause for a total of five months, the month of application plus one month as already provided for by 7 CFR 273.6(d), and three additional months as provided for by this adjustment. This adjustment may be used for actions taken on ongoing households and households with an initial application date of March 1, 2020 through May 31, 2020.

This adjustment does not include any changes to the Quality Control (QC) review process. QC will continue to cite errors as required in the FNS Handbook 310 and certification policy.

If you have questions or need additional information regarding this adjustment, please contact your respective Regional office representative.

Sincerely,

Sasha Gersten-Paal  
Director  
Program Development Division  
Supplemental Nutrition Assistance Program

Enclosure

Enclosure

**EXTEND GOOD CAUSE TIMEFRAME FOR FAILURE TO PROVIDE  
SOCIAL SECURITY NUMBER (SSN) REQUIREMENTS ADJUSTMENT  
RESPONSE**

1. **Adjustment serial number:** COV-076
2. **Type of request:** Initial
3. **Regulatory citation:** 7 CFR 273.6(d)
4. **State:** Illinois
5. **Region:** Midwest
6. **Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.6(d) require that households participating or applying for SNAP benefits provide the Social Security Number (SSN) of each household member, or apply for one before certification.
7. **Description of alternative procedures:** The State agency will extend the good cause timeframe for failure to provide a Social Security Number (SSN) for individuals participating or applying for SNAP for up to three additional months. This will allow the State agency to grant good cause for up to a total of five months, the month of application plus four additional months.
8. **Action and reason for approval or denial:** The Food and Nutrition Service (FNS) recognizes the need for adjustments due to the COVID-19 Public Health Emergency. As authorized by section 2302 of the Families First Coronavirus Response Act (P.L. 116-127), FNS' approval of this adjustment is based on the determination that the adjustment is consistent with what is practicable under actual conditions in areas affected by the COVID-19 Public Health Emergency. FNS is approving the adjustment for actions taken on ongoing households and households with an application date of March 1, 2020 through May 31, 2020.
9. **Conditions and reasons:** Approval is contingent upon the following conditions:
  - The State agency will submit a request to FNS for approval if it wishes to extend this adjustment beyond the initial period; and
  - The State will comply with all other mandatory verification requirements.

**10. Evaluation Data Requirements:** The State agency must provide to FNS the data and analysis listed below required for evaluation of this adjustment 45 days after expiration (July 15, 2020).

- Estimated number of households affected by this adjustment;
- A narrative on the effect of program access and client satisfaction, including an analysis of any client or advocate complaints received related to the adjustment procedure; and
- A narrative on the effect of providing timely and accurate benefits.

**11. Expiration date:** May 31, 2020.

**12. Quality control procedures:** No special Quality Control (QC) procedures are required for cases subject to the provisions of this adjustment. Cases should be reviewed using standard review procedures contained in the FNS Handbook 310.

**13. Anticipated implementation date (*notify FNS if actual date differs*):**  
Upon receipt of approval.