



March 23, 2020

Julie Mikkelson  
SNAP Director  
U.S. Food and Nutrition Service  
77 West Jackson Street, 20<sup>th</sup> Floor  
Chicago, IL 60604-3501

Dear Ms. Mikkelson:


Illinois continues to devise strategies that will reduce the spread of Coronavirus disease (COVID-19). With an increase in the number of individuals applying for SNAP benefits, Illinois is seeking ways to simplify the application process and ensure SNAP benefits are available to eligible households promptly.

The Illinois Department of Human Services (IDHS) is requesting a waiver of the regulatory requirement to verify mandatory verifications in 7 CFR 273.2 (f) and 7 CFR 273.12(a)(5) to permit client statements to be the primary source of verification for all eligibility requirements during the time Illinois is under a state of emergency due to COVID-19.

This waiver will allow for individuals to verbally attest to household circumstances impacting eligibility. This will eliminate the time spent requesting and waiting for documents to return and will allow for county agency workers to expeditiously process eligibility after completing the interview.

If you need additional information, please contact [Leslie.k.cully@illinois.gov](mailto:Leslie.k.cully@illinois.gov)  
217/785-3294.

Sincerely,



Grace B. Hou, Secretary  
Illinois Department of Human Services

Cc: Tim Verry, Director  
Leslie K. Cully, Associate Director  
Terri Vaniter, Bureau Chief

## STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** New
3. **Regulatory citation:** 7 CFR 273.2(f), 7 CFR 273.12(a)(5)
4. **Secondary regulation citation, if any:**
5. **State:** Illinois
6. **Region:** MWRO
7. **Regulatory requirements:** The Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 273.2(f) requires verification of many eligibility requirements. It also requires documentary evidence as the primary source of verification; whenever documentary evidence cannot be obtained or is insufficient to make a firm determination of eligibility or benefit level, the eligibility worker may require collateral contacts and in absence of that, use best available information. Regulatory requirements in 7 CFR 273.12(a)(5) requires certain reporting requirements for households while receiving benefits, including submitting an interim report in the middle of the certification period. The counties must act on changes and benefits are adjusted accordingly.
8. **Proposed alternative procedures:** The Illinois Department of Human Services (IDHS) is requesting a waiver of the regulatory requirement to verify mandatory verifications in 7 CFR 273.2 (f) and 7 CFR 273.12(a)(5) to permit client statements to be the primary source of verification for all eligibility requirements during the time Illinois is under a state of emergency due to COVID-19.
9. **Justification for request:** On January 31, 2020, the International Health Regulations Emergency Committee of the World Health Organization declared the outbreak of COVID-19 a public health emergency of international concern as well as Health and Human Services Secretary, Alex M. Azar II, declared a public health emergency for the United States. The Governor of Illinois, Governor JB Pritzker, declared a state of emergency of the entire state of Illinois on March 09, 2020, (Executive Order 2020.07) to protect the well-being of the citizens of Illinois from the dangerous effects of COVID-19. In addition to the state-declared state of emergency, on March 13, 2020, President Trump declared a national state of emergency over the COVID-19 pandemic.

This waiver will allow for individuals to verbally attest to household circumstances impacting eligibility. This will eliminate the time spent requesting and waiting for documents to return and will allow for state workers to expeditiously process eligibility after completing the interview. Further, while the number of applications increases, counties will not have the staff capacity to maintain the work and will need to prioritize accordingly. Allowing this exemption

will provide needy citizens of Illinois benefits quicker and lessen the strain on county workforce, who were already at capacity.

**10. Anticipated impact on households and State agency operations:** This waiver will eliminate the requirement for SNAP applicants to submit all needed mandatory verifications. Due to the expected influx in SNAP applications, we are seeking approval of this waiver to expeditiously ensure SNAP benefits are received timely, to assist county agencies in managing the substantially increased number of applications, and to issue benefits to vulnerable citizens quicker. Further, while the number of applications increases, the current county workforce level to process the work, already strained, will be unable to keep up with the demand.

**11. Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):** This waiver will apply to all SNAP applicants and recipient households. The number of SNAP recipients as of 02/2020 was 1,748,374 and the number of SNAP cases as of 02/2020 was 887,753.

**12. Anticipated implementation date and time period for which waiver is needed:** Immediately upon approval until the month following the month the state of emergency ends.

**13. Proposed quality control review procedures:** Cases will be reviewed in accordance with this waiver approval.

**14. State agency submitting waiver request and State contact person:** Illinois Department of Human Services, Leslie K. Cully

**15. Signature and title of requesting official:**

  
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Grace B. Hou, Secretary  
Illinois Department of Human Services

**16. Date of request:** March 23, 2020

**17. State agency staff contact (name/email/telephone):** Leslie K. Cully, [leslie.k.cully@illinois.gov](mailto:leslie.k.cully@illinois.gov) 217/785-3294.

**18. Regional office contact person:** Richard Uthoff, [Richard.Uthoff@usda.gov](mailto:Richard.Uthoff@usda.gov)