



March 23, 2020

Julie Mikkelson
SNAP Director
U.S. Food & Nutrition Services
77 West Jackson Street, 20th Floor
Chicago, IL 60604-3501

Dear Ms. Mikkelson:

Attached please find a request to waive Supplemental Nutrition Assistance Program (SNAP) regulations at §7 CFR 273.2 (c)(7)(i) Requirement for a signature. A form must be signed to establish a filing date and to determine the State agency's deadline for acting on the form. The State agency shall not certify a household without a signed form. 273.2 (iii) through (ix) (B) describes the various signing options – written, unwritten, electronic, telephonic (recorded), and gestured.

The approval of this waiver would allow IDHS to ensure Illinois can respond quickly to the increase in demand for SNAP benefits as a result of this health crisis. In addition, individuals who are unable to apply online will be able to call a local office and apply via telephone.

We look forward to hearing from you. If you have additional questions, please contact Leslie K. Cully at leslie.k.cully@illinois.gov or 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:** Initial due to COVID-19 emergency
3. **Statutory citation:** Families First Coronavirus Response Act
4. **Regulatory citation:** §7 CFR 273.2 (c)(7)
5. **State:** Illinois
6. **Region:** MWRO
7. **Regulatory requirements:**
§7 CFR 273.2 (c)(7)(i) Requirement for a signature. A form must be signed to establish a filing date and to determine the State agency's deadline for acting on the form. The State agency shall not certify a household without a signed form. 273.2 (iii) through (ix) (B) describes the various signing options – written, unwritten, electronic, telephonic (recorded), and gestured.
8. **Description of alternative procedures:**
On 3/23/2020, Illinois received a waiver approval to extend recertification dates by 6 months and suspend reporting requirements for other households during the pandemic. This allows Illinois eligibility staff to focus on new applications.

For new applications. Individuals who request assistance over the phone will have their applications completed, and interview held by the eligibility worker at the time of the call. The application date will be the date the phone interview takes place, which will be the same day the application is completed by eligibility staff. Many households do not have access to the internet, and as human service offices continue to close, households need easy access to benefits. Illinois still expects to receive applications via mail, fax and electronically. There will be no change to benefit start date when applications are received under normal processes. However, if a signature is missing on either the first page (sets date of eligibility) or last page (attesting to accuracy of application) eligibility staff will allow a verbal signature, note on the application and enter a case note in IES, Illinois' eligibility system.

For new applications, recertifications will be set at 12 months which is current Illinois policy.

9. **Justification for request:**

This request is justified pursuant to the Families First Coronavirus Response Act and 7 CFR 272.3(c) (1)(ii) which permits FNS to authorize waivers that result in a more effective and efficient administration of the program. The approval of this waiver would allow IDHS to ensure Illinois can respond quickly to the increase in demand for SNAP benefits as a result of this health crisis.

10. Anticipated impact on households and State agency operations:

Individuals that are unable to apply for benefits online will be able to call local offices and apply via telephone.

11. Caseload information:

Illinois currently serves 1,748,374 SNAP household members and 887,753 households (cases) as of 02/2020.

12. Anticipated implementation date and time period for which waiver is needed:

Immediately until the COVID-19 health crisis has passed.

13. Proposed quality control review procedures:

Illinois requests hold-harmless provisions for all waivers approved by USDA.

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:

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 217/785-3294.

18. Regional office contact person: Richard Uthoff, Richard.Uthoff@usda.gov