



April 17, 2020

Julie Mikkelson  
Midwest Regional Director  
Supplemental Nutrition Assistance Program  
United States Department of Agriculture  
77 West Jackson Blvd., 20th Floor  
Chicago, Illinois 60604-3507

Dear Julie Mikkelson:

The Illinois Department of Human Services (IDHS) is submitting a request to disregard federal regulations found at 7 CFR 273.9 (b)(2)(ii) to allow for the exclusion of Federal Pandemic Unemployment Compensation (FPUC) income for SNAP recipients.

During this unprecedented COVID-19 health emergency, the federal government has found there to be a sufficient need for the creation and issuance of a pandemic unemployment supplement. The emergency supplement will help low income families, and families who have recently lost their job due to COVID-19 continue to meet financial obligations such as housing and utility expenses. Disregarding this income for SNAP recipients recognizes the importance of this benefit to individuals and local economies, while at the same time helping to ensure all eligible households continue to have access to SNAP benefits which provide an important lifeline to one of our most basic human needs during this time. This disregard would also ease program administration by allowing Illinois to align SNAP policy with our health care programs and cash assistance programs. This additional administrative flexibility is essential during this time, due to the significant increase in applications resulting from this public health emergency and the need to achieve efficiencies wherever possible.

The State request is attached. We look forward to your response. Please feel free to contact me if you have any question. If you have additional questions, please contact me at [leslie.k.cully@illinois.gov](mailto:leslie.k.cully@illinois.gov)

Sincerely,

Grace B. Hou  
Secretary  
Illinois Department of Human Services

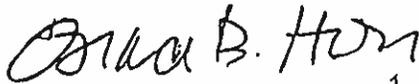
cc: Leslie Cully  
Terri Vaniter

## STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** Initial
3. **Regulatory citation:** 7 CFR 273.9 (b)(2)(ii)
4. **State:** Illinois
5. **Region:** MWRO
6. **Regulatory requirements:** (2) Unearned income shall include:  
(ii) Annuities; pensions; retirement, veteran's, or disability benefits; worker's or unemployment compensation including any amounts deducted to repay claims for intentional program violations as provided in § 272.12; old-age, survivors, or social security benefits; strike benefits; foster care payments for children or adults who are considered members of the household; gross income minus the cost of doing business derived from rental property in which a household member is not actively engaged in the management of the property at least 20 hours a week.
7. **Description of alternative procedures:** Illinois proposes to continue to count the non-pandemic unemployment benefit amount received by a SNAP recipient, but to exclude any amount of unemployment authorized under the CARES Act and denoted as Federal Pandemic Unemployment Compensation (FPUC) \$600 for the duration of receipt.
8. **Justification for request:** During this unprecedented COVID-19 health emergency, the federal government has found there to be a sufficient need for the creation and issuance of a pandemic unemployment supplement. The emergency supplement will help low income families, and families who have recently lost their job due to COVID-19 continue to meet financial obligations such as housing and utility expenses. The additional pandemic unemployment should be disregarded, ensuring all eligible households continue to have access to SNAP benefits, which provide an important lifeline to one of our most basic human needs during this public health emergency.  
  
Disregarding Federal Pandemic Unemployment Compensation (FPUC) benefits would also ease program administration by allowing Illinois to align SNAP policy with our health care and cash programs. This additional administrative flexibility is essential during this time, due to the significant increase in applications resulting from this public health emergency and the need to achieve efficiencies wherever possible.
9. **Anticipated impact on households and State agency operations:** Current and new

SNAP households will continue receiving SNAP benefits without interruptions or reductions. Administratively, this will allow all programs of assistance to align, resulting in a streamlined application process and significant efficiencies for staff.

10. **Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):** SNAP caseload is 891,097 households statewide as of February 2020.
11. **Anticipated implementation date and time period for which waiver is needed:** Immediately upon approval and for the duration of receipt of FPUC.
12. **Proposed quality control review procedures:** No impact to quality control review procedures.
13. **State agency submitting waiver request and State contact person:** Illinois Department of Human Services, Terri Vaniter, [terri.vaniter@illinois.gov](mailto:terri.vaniter@illinois.gov)
14. **Signature and title of requesting official:**



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Grace B. Hou  
Title: Secretary, Illinois Department of Human Services

Email for transmission of response:  
[Leslie.k.cully@illinois.gov](mailto:Leslie.k.cully@illinois.gov)

15. **Date of request:** 04/17/2020
16. **State agency staff contact (name/email/telephone):** Terri Vaniter, [terri.vaniter@illinois.gov](mailto:terri.vaniter@illinois.gov), 217-785-9637
17. **Regional office contact person (to be completed by FNS regional office):**