



Bruce Rauner, Governor • James T. Dimas, Secretary

September 29, 2017

Ms. Susan Holzer, Director
Supplemental Nutrition Assistance Program
Midwest Region
USDA Food and Nutrition Service
77 West Jackson Blvd., 20th Floor
Chicago, Illinois 60604-3507

Dear Ms. Holzer:

Illinois is requesting a waiver under Section 6(0) of the Food Stamp Act, as amended by Section 824 of the Personal Responsibility and Work Opportunity and Reconciliation Act of 1996 (PRWORA). This waiver request is to exempt Illinois residents in all counties except DuPage County from the work requirement of 7 CFR 273.24, to be effective January 1, 2018 and remain through December 31, 2018.

We believe Illinois qualifies for a waiver, with the exception of DuPage County, based on having an unemployment rate that is 20 percent above the national average for the 24-month period of April 2015 through March 2017. The national average unemployment rate for this time period was 5.0 percent; Illinois' average unemployment rate for the same period was 5.9 percent, 20 percent higher than the national average.

We are not seeking a waiver for DuPage County due to the unemployment rate being below the national average unemployment rate. DuPage County had an average unemployment rate of 4.6% for the same 24-month period of April 2015 through March 2017.

Attached please find documentation to support our request. If you have questions, please contact me. We look forward to your response.

Sincerely,

Diane Grigsby Jackson
Illinois SNAP Director
IDHS Family & Community Services

cc: Terri Vaniter
Judy Davis
Martha Bradley
Dawn Keiser

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):** 2150013
2. **Type of request:** Amendment and extension
3. **Statutory citation:** Section 6(o) of the Food and Nutrition Act of 2008, as amended
4. **Regulatory citation:** 7 CFR 273.24
5. **State:** Illinois
6. **Region:** MWRO
7. **Regulatory requirements:**

Section 6(o) of the Food and Nutrition Act of 2008, as amended, provides that no able-bodied adult without dependents (ABAWD) shall be eligible to participate in the Supplemental Nutrition Assistance Program (SNAP) as a member of any household if the individual received program benefits for more than 3 months during any 3-year period in which the individual was subject to but did not comply with the ABAWD work requirement. Section 6(o) also provides that, upon the request of the State agency, the Secretary may waive the applicability of the 3-month ABAWD time limit for any group of individuals in the State if the Secretary makes a determination that the area in which the individuals reside has an unemployment rate of over 10 percent, or does not have a sufficient number of jobs to provide employment for the individuals.
8. **Description of alternative procedures:**

The State of Illinois is requesting to exempt able-bodied adults without dependents (ABAWDs) in 101 counties from SNAP time limits at 7 CFR 273.24. We are not requesting that DuPage County be exempt from the SNAP time limit.
9. **Justification for request:**

Under SNAP regulations at 7 CFR 273.24(f)(2), areas may support a claim of insufficient jobs by submitting evidence that an area has an average unemployment rate for a 24-month time period that exceeds the national average for the same 24-month period by 20 percent. 7 CFR 273.24(f)(6) provides that States may define areas to be waived.

The State of Illinois seeks a waiver for a region of 101 contiguous counties (excluding DuPage County) based on the region's aggregate average unemployment rate for the 24-month period of April 2015 through March 2017. The national average unemployment rate for this period was 5.0 percent; 20 percent above this was 5.9 percent. The region's aggregate average unemployment rate for this period was 5.9 percent.

**Bureau of Labor Statistics Local Area Unemployment Data
April 2015 through March 2017**

Contiguous Counties	Unemployed Total	Labor Force Total
Adams County	37,680	778,247
Alexander County	4,990	55,132
Bond County	9,776	189,005
Boone County	43,482	634,989
Brown County	2,326	68,312
Bureau County	25,404	414,700
Calhoun County	3,612	56,691
Carroll County	10,462	189,329
Cass County	8,456	151,438
Champaign County	128,782	2,524,578
Christian County	23,606	369,415
Clark County	11,501	194,427
Clay County	10,943	160,376
Clinton County	21,533	487,696
Coles County	34,466	583,071
Cook County	3,818,316	63,730,941
Crawford County	13,472	221,864
Cumberland County	7,414	142,435
De Witt County	10,659	189,056
DeKalb County	71,947	1,316,651
Douglas County	11,678	245,134
Edgar County	13,965	230,707
Edwards County	4,088	71,100
Effingham County	21,087	445,978
Fayette County	15,291	231,253
Ford County	8,619	157,541
Franklin County	32,086	397,391
Fulton County	28,358	379,307
Gallatin County	4,329	60,087
Greene County	8,627	144,526
Grundy County	40,952	613,181
Hamilton County	6,064	102,564
Hancock County	13,522	211,509
Hardin County	3,193	34,560
Henderson County	5,489	89,583
Henry County	36,640	602,480

Iroquois County	19,834	355,054
Jackson County	37,309	688,090
Jasper County	6,957	110,437
Jefferson County	27,214	414,775
Jersey County	15,963	268,044
Jo Daviess County	14,724	272,946
Johnson County	8,558	99,821
Kane County	361,561	6,446,763
Kankakee County	86,152	1,318,612
Kendall County	80,787	1,597,328
Knox County	33,865	557,767
Lake County	468,488	8,906,211
LaSalle County	93,538	1,376,448
Lawrence County	10,813	147,881
Lee County	22,202	429,921
Livingston County	22,112	406,269
Logan County	16,647	313,361
Macon County	81,015	1,212,287
Macoupin County	33,561	558,434
Madison County	188,060	3,226,354
Marion County	28,066	431,423
Marshall County	8,987	136,849
Mason County	11,150	156,108
Massac County	10,401	145,635
McDonough County	20,617	335,859
McHenry County	208,264	3,994,066
McLean County	107,060	2,164,074
Menard County	7,578	163,435
Mercer County	12,230	196,963
Monroe County	18,010	438,612
Montgomery County	20,950	290,651
Morgan County	20,193	409,069
Moultrie County	7,984	177,734
Ogle County	37,328	621,834
Peoria County	146,898	2,154,564
Perry County	14,869	209,402
Piatt County	10,138	201,694
Pike County	9,315	181,806
Pope County	2,993	42,476
Pulaski County	4,445	50,229

Putnam County	4,261	74,155
Randolph County	17,833	347,484
Richland County	10,582	180,291
Rock Island County	108,735	1,732,775
Saline County	19,813	241,822
Sangamon County	126,387	2,551,046
Schuyler County	4,681	81,195
Scott County	3,486	61,292
Shelby County	14,264	247,097
St. Clair County	187,836	3,051,966
Stark County	4,671	66,612
Stephenson County	31,334	516,524
Tazewell County	100,954	1,602,247
Union County	13,468	179,129
Vermilion County	60,173	843,646
Wabash County	8,192	134,887
Warren County	10,768	205,702
Washington County	8,521	228,521
Wayne County	13,715	175,919
White County	10,259	164,686
Whiteside County	40,631	686,406
Will County	509,245	8,593,932
Williamson County	47,333	768,141
Winnebago County	240,603	3,415,742
Woodford County	24,682	470,037
Combined Area Total	8,512,078	144,305,794
Combined Area Unemployment Rate	5.9%	
20% Above National Average Threshold	5.9%	

10. Anticipated impact on households and State agency operations:

This waiver will provide consistency for households and State agency operations in areas where unemployment remains higher than the national average.

11. Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):

The caseload for these areas, as of 08/2017, represent 97% of the caseload for the state. There are no quality control procedures involved. The Quality control error rate for the waived area for the period of 10/2016 through 05/2017 resulted in a QC error rate of 0.35%.

12. Anticipated implementation date and time period for which waiver is needed:
The State is requesting a one-year waiver, from January 1, 2018 through December 31, 2018.

13. Proposed quality control review procedures:
There are no special quality control procedures needed in conjunction with this waiver.

14. State agency submitting waiver request and State contact person:
State of Illinois, Terri Vaniter

15. Signature and title of requesting official:



Title: Illinois SNAP Director

Email for transmission of response:

Diane.grigsbyjackson@illinois.gov

16. Date of request: 09/29/2017

17. State agency staff contact (name/email/telephone): Diane Grigsby Jackson

Diane.GrigsbyJackson@illinois.gov

1 312 793-4644

18. Regional office contact person (to be completed by FNS regional office):