



Bruce Rauner, Governor

Illinois Department of Human Services

James T. Dimas, Secretary

100 South Grand Avenue, East • Springfield, Illinois 62762
401 South Clinton Street • Chicago, Illinois 60607

November 15, 2018

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, 2019 and remain through December 2019.

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 January 2016 through December 2017. The national average unemployment rate for this time period was 4.6 percent; Illinois' average unemployment rate for the same period was 5.5 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: Beverly Templeton

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
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.
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 based on the region's aggregate average unemployment rate for the 24-month period of January 2016 through December 2017. The national average unemployment rate for this period was 4.6 percent; 20 percent above this was 5.5 percent. The region's aggregate average unemployment rate for this period was 5.5 percent. The table below shows the 101 counties that fall under this waiver request.

**Bureau of Labor Statistics Local Area Unemployment Data
January 2016 through December 2017**

Contiguous Counties	Unemployed Total	Labor Force Total
Adams County	33,082	775,938
Alexander County	4,495	52,317
Bond County	8,861	188,178
Boone County	40,374	627,579
Brown County	2,106	68,305
Bureau County	22,395	415,909
Calhoun County	3,249	56,662
Carroll County	9,397	185,477
Cass County	7,410	148,598
Champaign County	116,910	2,517,057
Christian County	20,783	360,286
Clark County	10,125	191,898
Clay County	9,577	159,766
Clinton County	19,275	487,990
Coles County	30,593	586,841
Cook County	3,616,507	63,872,857
Crawford County	12,128	213,424
Cumberland County	6,536	144,782
De Witt County	9,616	187,616
DeKalb County	64,608	1,315,560
Douglas County	10,626	243,993
Edgar County	12,313	229,347
Edwards County	3,592	69,658
Effingham County	18,916	449,285
Fayette County	13,870	231,824
Ford County	7,932	156,180
Franklin County	28,555	396,967
Fulton County	25,432	374,387
Gallatin County	3,942	59,797
Greene County	7,764	144,250
Grundy County	39,166	617,617
Hamilton County	5,505	103,971
Hancock County	12,020	207,548
Hardin County	2,830	32,780
Henderson County	4,869	88,235
Henry County	32,973	598,139

**Bureau of Labor Statistics Local Area Unemployment Data
January 2016 through December 2017**

Iroquois County	17,512	354,152
Jackson County	33,100	679,392
Jasper County	6,076	109,889
Jefferson County	24,558	418,477
Jersey County	13,865	263,579
Jo Daviess County	13,060	268,274
Johnson County	7,941	99,410
Kane County	329,129	6,442,381
Kankakee County	76,978	1,337,096
Kendall County	78,467	1,631,482
Knox County	30,472	544,414
Lake County	427,233	8,911,423
LaSalle County	82,681	1,351,649
Lawrence County	9,759	146,440
Lee County	20,022	429,234
Livingston County	19,675	403,178
Logan County	15,216	310,530
Macon County	71,787	1,192,611
Macoupin County	29,694	556,606
Madison County	168,584	3,219,639
Marion County	24,524	427,518
Marshall County	7,914	133,075
Mason County	10,009	153,610
Massac County	9,534	142,778
McDonough County	18,324	329,821
McHenry County	197,580	4,027,103
McLean County	97,316	2,139,968
Menard County	6,981	163,273
Mercer County	10,908	194,853
Monroe County	16,144	441,710
Montgomery County	18,209	287,997
Morgan County	18,381	400,854
Moultrie County	7,381	176,285
Ogle County	33,274	611,196
Peoria County	131,351	2,082,858
Perry County	13,218	204,068
Piatt County	9,060	203,740

Bureau of Labor Statistics Local Area Unemployment Data January 2016 through December 2017		
Pike County	8,382	176,235
Pope County	2,732	42,175
Pulaski County	4,176	51,453
Putnam County	3,790	73,039
Randolph County	16,002	343,634
Richland County	9,526	180,727
Rock Island County	96,203	1,707,769
Saline County	17,575	236,621
Sangamon County	113,901	2,513,772
Schuyler County	3,981	79,669
Scott County	3,201	59,830
Shelby County	12,460	247,180
St. Clair County	165,863	3,032,386
Stark County	4,330	65,203
Stephenson County	26,780	514,889
Tazewell County	90,641	1,556,029
Union County	12,175	178,354
Vermilion County	55,693	828,903
Wabash County	7,553	136,045
Warren County	9,720	207,878
Washington County	7,661	230,035
Wayne County	12,369	169,827
White County	9,172	162,233
Whiteside County	35,659	680,527
Will County	485,654	8,701,506
Williamson County	42,784	765,368
Winnebago County	216,728	3,358,605
Woodford County	22,341	457,818
Combined Area Total	7,881,301	144,109,291
Combined Area Unemployment Rate	5.5%	
20% Above National Average Threshold	5.5%	

Data shown in the table was sourced from the Bureau of Labor Statistics:



IL 2019 Waiver
Analysis Spreadsheet

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 09/2018, 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 10/2017 through 05/2018 resulted in a QC error rate of 0.42%.

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

The State is requesting a one-year waiver, from January 1, 2019 through December 31, 2019.

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, Diane GrigsbyJackson

15. Signature and title of requesting official:



Diane GrigsbyJackson
Title: Illinois SNAP Director
Email for transmission of response:
Diane.grigsbyjackson@illinois.gov

16. Date of request: 11/15/2018

17. State agency staff contact (name/email/telephone): Bev Templeton

18. Beverly.Templeton@illinois.gov 217-524-9156

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