

**Illinois Elderly Simplified Redetermination Process (ESRP)
Waiver**

Type of Request: Initial

Date of Request: 03/13/2020

Region: MWRO

State: Illinois

Statutory Citations

Section 3(f) of the Acts notes that the certification period shall not exceed 12 months, except that the certification period may be up to 24 months if all adult household members are elderly or disabled

Section 6(c)(1)(D)(i) of the Act notes that State agency may require households that report on a periodic basis to submit reports not less often than once each 6 months, but not more often than once each month.

Regulatory Citations

7 CFR 273.12(a)(5)(iii)(G) states that the periodic report form shall be the sole reporting requirement for any information that is required to be reported on the form, with an exception for households that are required to report less frequently than quarterly shall report when monthly gross income exceeds the monthly gross income limit for its household size, and when able-bodied adults subject to the time limit work less than 20 hours per week, averaged monthly.

7 CFR 273.14(b)(3) requires the State agency interview at applicants prior to recertification.

Justification for request: The Department believes that the implementation of this waiver will increase the efficiency of the SNAP redetermination process as well as improve the delivery of SNAP benefits to eligible households. Under this waiver, the Department seeks to simplify the redetermination and recertification process for households with members who are elderly or who have a disability and have no earned income. The elderly is an historically underserved population who face many barriers to participation including limited mobility and minimal access to electronic equipment that can facilitate compliance with verification and reporting requirements. As a result, the burden of the typical SNAP redetermination process may hinder the participation of these vulnerable groups, while contributing relatively little information that cannot be found and verified elsewhere. Low-income elderly and disabled households with no earned income often live in stable settings where factors like unearned income (e.g. social security, SSI), social security number, residency, are readily verifiable through other

means like data matches. This waiver would work to minimize these barriers while balancing the need for elderly and disabled participants to continue to receive the full benefits they are entitled to receive.

Description of alternative procedures:

a. **Eligibility:** Elderly simplified reporting would be available to households that meet all the following criteria:

- every member of the household is at least 60 years old, has a disability or both;
- no member of the household has an earned income; and
- the members purchase and prepare meals together.

Households meeting the above criteria would use a simplified renewal redetermination. These households would be distinguished by a new SNAP program identifier in IES. If a household does not meet the eligibility requirements, the household would follow the existing SNAP eligibility process.

b. **Redetermination Form:** This waiver will implement a simplified redetermination which will be available in paper and online.

c. **Expedited Service:** These households will be screened for eligibility for expedited service.

d. **Conversion of Households Participating in Regular SNAP:** Current SNAP households that meet these requirements will be converted at the next FCRC contact that requires eligibility to be run (for example, changes in income and redeterminations). Additionally, households that were recertified within 6 months of implementation would have their certifications extended by up to 24 months.

e. **Interview:** Each household must still have an initial certification interview, but an interview will not be required at recertification unless a household specifically requests one. The redetermination will contain language to inform the household that an interview is not required unless the household requests one.

f. **Verification:** Whenever possible, data exchanges will be used as verification for ESAP households. Data exchanges may not be able to verify some information, such as medical expenses, identity, some income (such as pensions), and disabilities. In those instances, the individual would be required to provide documentation. Verification will be requested when an unverified change has been reported by the household or received from a third party. Verification will also be requested from the household when a discrepancy has been identified.

Households may be asked to provide verification for items such as medical expenses and earned.

- g. **Recertification:** These households will be sent a recertification redetermination to be completed at the end of its certification period. When eligibility is run for a recertification on these cases and the household is no longer eligible, an interview will be scheduled and attempted before the case could be closed. These households will receive an annual interim contact report. The letter will tell the ESRP household to contact the FCRC if any of the following changes take place:
- Change in address;
 - Change in household composition;
 - New job;
 - Changes in income (more than \$100 earned or unearned); or
 - Changes in medical expenses.

ESRP households will be required to report changes within 10 days of the date the change became known to the household. If a household is no longer eligible (example: a person moves into home and has earnings), but could change reporting statuses, the certification cannot be shortened.

h. **Outreach:** The Department will identify and inform organizations and provide training on redetermination and eligibility criteria.

i. **Training:** Training will be designed so that eligibility workers will be trained on the certification procedures and other components of this waiver.

Caseload information: As of 03/11/2020, the total SNAP caseload size was 775,065 of which 400,907 were elderly/disabled households (52%).

Description of anticipated changes in program enrollment, costs, or other impacts on households and State agencies operations:

The Department doesn't anticipate any enrollment, cost or other impacts on households and State agency costs. The Department anticipates the ESRP waiver project will be cost neutral.

Anticipated implementation date and time period for which waiver is needed: The is requesting approval to implement the ESRP waiver project for a five-year period starting upon the completion of the critical updates to the Integrated Eligibility System.

State agency submitting waiver request and State contact person:

Leslie Cully
Associate Director, Family and Community Services
Illinois Department of Human Services

Signature and title of requesting official:



Title: Illinois SNAP Director

Email for transmission of response: leslie.cully@illinois.gov

Date of request:

State agency staff contact (name/email/telephone):

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