

Tony Evers  
Governor



Andrea Palm  
Secretary

**State of Wisconsin**  
**Department of Health Services**

**DIVISION OF MEDICAID SERVICES**

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May 28, 2019

Julie Mikkelson  
Midwest Regional SNAP Director  
United States Department of Agriculture  
Food and Nutrition Service, Midwest Region  
77 West Jackson Blvd., 20<sup>th</sup> Floor  
Chicago, IL 60604-3507

Dear Julie Mikkelson,

Enclosed for your review is documentation to lift the Supplemental Nutrition Assistance Program (SNAP) ABAWD work requirement for six counties and ten tribes in Wisconsin for federal fiscal year (FFY) 2020. These tribes and counties have an average unemployment rate for a 24-month time period that is at least 20 percent above the national average for the same time period, as required in 7 CFR 273.24(f)(2). The State of Wisconsin worked with the Center on Budget and Policy Priorities to analyze unemployment data for the period of January 2017 through December 2018. During this period the national average unemployment rate was 4.1 percent; 20 percent above this rate was 4.9 percent. The regions outlined in the attached document had unemployment rates that were at 4.9 percent or greater during this time period. Implementing this option will allow Wisconsin residents in areas with high unemployment rates to continue to access SNAP benefits and decrease food insecurity.

Wisconsin appreciates the Food and Nutrition Service's review and approval of this option. If you have questions or concerns you may reach out to Katie Vieira at [Kathleen.Vieira@dhs.wisconsin.gov](mailto:Kathleen.Vieira@dhs.wisconsin.gov) or 608 261-7832.

Sincerely,

A handwritten signature in cursive script that reads "Deborah Waite".

Deborah Waite  
Deputy Bureau Director,  
Bureau of Enrollment Policy and Systems,  
Wisconsin Department of Health Services

cc: Sheena Panoor, FNS  
Marlia Mattke, DHS  
Michele Dickinson, DHS  
Kathleen Vieira, DHS

## STATE OPTION REQUEST

1. **State Option Serial Number (if applicable):**
2. **Type of request:** Initial
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:** Wisconsin
6. **Region:** MWRO
7. **Regulatory requirements:**

Under 7 CFR 273.24(b) individuals are not 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 three months during any three-year period in which the individual was subject to, but did not comply with, the SNAP work requirements. Regulations at 273.24(a) provide that fulfilling the work requirement means: working 20 hours or more per week, averaged monthly; participating in and complying with the requirements of a work program or a workfare program for at least 20 hours per week; or any combination of working and participating in a work program for a total of 20 hours per week.

Under 7 CFR 273.24(f), upon the request of a State agency, the Food and Nutrition Service (FNS) may lift the applicability of the time limit described above for any group of individuals in the State if FNS makes a determination that the area in which the individuals reside does not have a sufficient number of jobs to provide employment for the individuals.
8. **Description of alternative procedures:**

The State of Wisconsin is requesting to exempt able-bodied adults without dependents (ABAWDs) in six counties and 10 tribes 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 qualify for an ABAWD time limit option if they have insufficient jobs. To support this claim, states may submit evidence that an area has an average unemployment rate for a 24-month time period that is at least 20 percent above the national average for the same 24-month period. 7 CFR 273.24(f)(6) provides that States may define areas to be waived.

The State of Wisconsin seeks a state option for a region of 3 counties based on its regional average unemployment rate for the 24-month period of January 2017

through December 2018. The national average unemployment rate for this 24-month period was 4.1 percent; 20 percent above this was 4.9 percent. The unemployment rate for this region was 4.9 percent for the same period.

<b>Bureau of Labor Statistics Local Area Unemployment Data January 2017 through December 2018</b>		
<b>County</b>	<b>Total Unemployed</b>	<b>Total Labor Force</b>
Ashland County	8,388	189,902
Bayfield County	9,227	182,569
Iron County	3,747	62,393
<b>Total for Region</b>	<b>21,362</b>	<b>434,864</b>
<b>Combined Region Unemployment Rate</b>	<b>4.9%</b>	
<b>20% Above National Average Threshold</b>	<b>4.9%</b>	

The State of Wisconsin seeks a state option for three individual counties based on their average unemployment rates that are 20 percent above the national average for the 24-month period of January 2017 through December 2018. The national average unemployment rate for this 24-month period was 4.1 percent; 20 percent above this was 4.9 percent.

<b>Bureau of Labor Statistics Local Area Unemployment Data January 2017 through December 2018</b>			
<b>Individual Counties</b>	<b>Unemployed Total</b>	<b>Labor Force Total</b>	<b>Unemployment Rate</b>
Adams County	9,691	197,596	<b>4.9%</b>
Forest County	4,750	96,430	<b>4.9%</b>
Menominee County	2,252	38,758	<b>5.8%</b>
<b>20% Above National Average Threshold</b>	<b>4.9%</b>		

The State requests to lift the ABAWD work requirement for the following reservations based on having average unemployment rates exceeding the national average for a recent 24-month period. The reservation unemployment rates were calculated by applying 2017 American Community Survey<sup>1</sup> share ratios to county-level BLS data from March 2017 – February 2019. The following table summarizes the calculations:

<sup>1</sup> These calculations are based on data from the 2013-2017 American Community Survey 5-Year Estimates.

<b>American Community Survey and Bureau of Labor Statistics Data March 2017 through February 2019</b>			
	<b>Unemployed</b>	<b>Labor Force</b>	<b>Unemployment Rate</b>
Total Bad River Reservation & non-reservation trust land	1,540	15,041	10.2%
Total Forest County Potawatomi Reservation & non-reservation trust land	656	4,472	14.7%
Total Ho-Chunk Nation non-reservation trust land	1,008	14,001	7.2%
Total Lac Courte Oreilles Reservation & non-reservation trust land	3,686	27,216	13.5%
Total Lac du Flambeau Reservation & non-reservation trust land	2,667	36,861	7.2%
Total Menominee Reservation & non-reservation trust land	2,025	31,540	6.4%
Total Red Cliff Reservation & non-reservation trust land	1,770	16,665	10.6%
Total St. Croix Reservation & non-reservation trust land	842	6,729	12.5%
Total Sokaogon Chippewa Community Reservation & non-reservation trust land	1,260	6,298	20.0%
Total Stockbridge Munsee Community Reservation & non-reservation trust land	428	8,053	5.3%

**10. Anticipated impact on households and State agency operations:**

This state option 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 **April 2019**, represent **2.01%** of the caseload for the state. There are no quality control procedures involved.

**12. Anticipated implementation date and time period for which state option is needed:**

The State is requesting a one-year option, from October 1, 2019 through September 30, 2020.

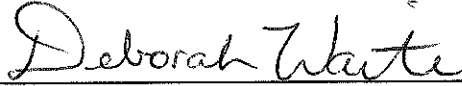
**13. Proposed quality control review procedures:**

There are no special quality control procedures needed in conjunction with this state option.

**14. State agency submitting option request and State contact person:**

Deborah Waite  
Deputy Bureau Director,  
Bureau of Enrollment Policy and Systems,  
Wisconsin Department of Health Services

**15. Signature and title of requesting official:**



Title: Deputy Bureau Director, Bureau of Enrollment Policy and Systems  
Email for transmission of response: [Deborah.Waite@dhs.wisconsin.gov](mailto:Deborah.Waite@dhs.wisconsin.gov)

**16. Date of request:** May 28, 2019

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

Kathleen Vieira  
[Kathleen.Vieira@dhs.wisconsin.gov](mailto:Kathleen.Vieira@dhs.wisconsin.gov)  
608 261-7832

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