

# SNAP Waiver Decision Worksheet

## WAIVER DETAILS

1. State or Retailer Name:
2. Waiver Title:
3. Waiver Number or Identifier:
4. Analyst:
5. Type:
  - a. Other, if applicable:
6. Waiver Type:
7. Request Type:
8. Date Received:
9. Final Decision:
10. Final Decision Date:

## WAIVER REQUEST

1. Does the request include all required waiver request parts?
2. Did FNS provide any technical assistance on this request?
3. Briefly describe any technical assistance provided.
4. Is this request a routine waiver? If yes, you may be finished with this coversheet. Confirm with your SOP. If no, continue to the next section.

## ADDITIONAL WAIVER INFORMATION

1. Does the submission request to modify a current active waiver?
2. If applicable, Please provide a brief description of the modification.
3. Does the request include novel or innovative waivers or processes?
4. If applicable, please provide a brief description of the novel or innovative component?

5. Was anything, such as a write up, summary, etc, sent to leadership for an approval or denial decision that is above a Division Director?
6. If applicable, please provide details on leadership's decision to approve or deny the request, the date the decision was issued, the reason for the decision and/or the policy interpretation. Make sure any relevant emails and/or briefing papers are included in the casefile, as applicable.
7. If applicable, does the request have potential adverse impacts on any of the following:
  - a. Program Integrity
  - b. Program access
  - c. Timeliness
  - d. Churn
  - e. Administrative Burden
  - f. Civil Rights
  - g. Other:

#### DATA REPORTS AND EVALUATIONS, IF APPLICABLE

1. Have all required data reports been submitted?
2. Are the data reports sufficient for FNS to evaluate the request?
3. If applicable, are the data reports sufficient for FNS to determine cost neutrality?

**From:** [Buhrig, Catherine - FNS](#)  
**To:** [Gersten-Paal, Sasha - FNS](#); [FNS-SNAP-FO](#)  
**Cc:** [Link, Riley - FNS](#); [Kamau, Catrina - FNS](#); [Halverson, Kristen - FNS](#)  
**Subject:** RE: Waiver for Response by 9/13: Wisconsin ABAWD Waiver Partial Approval  
**Date:** Thursday, September 12, 2024 3:28:52 PM  
**Attachments:** [image001.png](#)

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Appreciate the background. Thank you for sharing

*Cathy Buhrig* MS, MPA

She/her/hers  
Associate Administrator  
Supplemental Nutrition Assistance Program  
Food and Nutrition Service  
U.S. Department of Agriculture  
✉ [catherine.buhrig@usda.gov](mailto:catherine.buhrig@usda.gov)



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**From:** Gersten-Paal, Sasha - FNS <sasha.gersten-paal@usda.gov>  
**Sent:** Wednesday, September 11, 2024 8:34 PM  
**To:** FNS-SNAP-FO <FNS-SNAP-FO@usda.gov>  
**Cc:** Link, Riley - FNS <Riley.Link@usda.gov>; Kamau, Catrina - FNS <catrina.kamau@usda.gov>; Halverson, Kristen - FNS <Kristen.Halverson@usda.gov>  
**Subject:** Fwd: Waiver for Response by 9/13: Wisconsin ABAWD Waiver Partial Approval

Cathy,

Ron said you wanted more information on the Wisconsin partial ABAWD approval. MWRO reached out today too and they are also aware it will likely be a partial approval.

Let us know if you need more information or want to discuss. We will be at the food bank most of the morning but can step out to chat. We plan to issue the response on Friday and add to the Weekly to inform policy officials, unless we hear otherwise from you.

Thanks  
Sasha

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**Background:**

As background, Wisconsin requested to waive the ABAWD time limit in certain zip codes in Milwaukee city based on methodology that FNS has historically only used to justify approving

waivers for tribal reservations. This approach combines older data from Census Bureau's American Community Survey (ACS) along with more recent BLS data whereas SNAP typically only uses BLS data to evaluate labor force data, per 7 CFR 273.24(f)(2). Wisconsin also provided publications to support waiving the areas in conjunction with the proposed methodology, however, the information provided is not current and does not demonstrate a lack of sufficient jobs or a lack of jobs in declining occupations or industries.

SNAP received a similar request from Minnesota in FY2023 to use the same methodology to waive certain zip codes in that State. SNAP ended up denying that portion of Minnesota's request with clearance from DUSEC's office (attached). SNAP has the same concerns with Wisconsin as with Minnesota, about the recency of the ACS data on unemployment along with concerns about the accuracy of this methodology for such small geographic areas. CPB recommends following the same path we took with Minnesota and issuing a partial approval. CPB would deny this portion of the request and approve this portion of the request that uses established methodology.