

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** New
3. **Regulatory citation:** 7 CFR 275
4. **Secondary regulation citation, if any:**
5. **State:** Wisconsin
6. **Region:** Midwest Region
7. **Regulatory requirements:** The Supplemental Nutrition Assistance Program (SNAP) regulations at 7 CFR 275(a) outlines the State agency requirement of quality control reviews.

7 CFR 275.12(c)(1) Field investigation states in part that, “The field investigation will include interviews with the head of household, spouse, or authorized representative; contact with collateral sources of information; and any other materials and activity pertinent to the review of the case.”

The FNS 310 Handbook states in part in section 213, “During the field review, the reviewer must interview the household or, when appropriate, the authorized representative and obtain verification from collateral contacts.”

7 CFR 275.14(b) Reviewing process states in part that, “The reviewer shall follow the procedures outlined in the Quality Control Review Handbook, FNS Handbook 310, to conduct quality control reviews.”

The FNS Handbook states in part in section 620, “The allotment test may consist of a two-step process: Comparison I and II. Section 621 states, “The first comparison is of an allotment computed based on actual, verified sample month circumstances for items the household is entitled to have considered in the benefit calculation to the authorized allotment.” Section 622 states, “The second comparison is of the authorized allotment and an allotment based on the actual verified budget/certification month circumstances.”

8. **Proposed alternative procedures:** The Wisconsin Department of Health Services proposes to align the April, May, and June active case sample with the CAPER review methodology as outlined in section 1310 of the 310 manual. This would mean temporarily suspending the requirement of a personal interview and completion of Comparison 1. Aligning the review procedures with the CAPER review methodology would mean the active case review would become a desk review following Comparison II procedures with possible contact with the household or collateral contact. The state proposes to use information available in the electronic case file, data matches, and collateral contacts to determine whether a case allotment is correct and will only contact clients when information is not available.

- 9. Justification for request:** There will be significant impact on the QC review process as a result of the current health crisis if certain regulatory requirements are not waived. Reviewers and clients will struggle to obtain “sample” month (Comparison I) verifications with the number of businesses that have been forced to close during this economic downturn. Also, as the health crisis continues individuals who a drastic decrease to their income will find it challenging to maintain a home or cellular phone due to the current state economy which will make it difficult to complete the interview. A state’s inability to complete a personal interview and/or obtain corroborative verifications during the health crisis will result in a decrease in a state’s completion rate. These temporary measures will help to increase the completion rates and thus, lessen the chances for a higher payment error rate due to the impact of regression, which would be a misrepresentation of actual errors taking place during this time.

Approval of this waiver will help to reduce the health risks of our clients and staff and help to continue the QC review process during the crisis. Adopting the approved FNS CAPER review methodology will maintain the integrity of active SNAP QC reviews, allow for the continuity in the measurement of errors, and ultimately result in a more accurate reporting of the fiscal year error rate.

- 10. Anticipated impact on households and State agency operations:** The proposed process will allow households to maintain social distancing measures and will not negatively impact a household if they are unable to complete an interview and/or provide verification. This waiver will allow the state agency to continue monitoring program integrity through the QC review process without putting anyone at risk. In addition, to further reduce negative impact on households Wisconsin has submitted a waiver to not sanction a household for refusal to cooperate during the health crisis.
- 11. Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):** This waiver will apply to all SNAP household selected for review in sample months April, May, and June of 2020. Wisconsin’s federal fiscal year (FFY) 2018 quality control error rate was 7.65%. The number of SNAP recipients as of February 2020 is 598,392.
- 12. Anticipated implementation date and time period for which waiver is needed:** Implementation of this would start with the Wisconsin’s April 2020 QC sample month and continue through June 2020.

- 13. State agency submitting waiver request and State contact person:**
Wisconsin Department of Health Service, Jayne Wanless

- 14. Signature and title of requesting official:**



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15. Date of request: April 22, 2020

16. State agency staff contact (name/email/telephone): Jayne Wanless, jaynem.wanless@wi.gov , 608-267-7371

17. Regional office contact person:, Melissa Cundari, melissa.cundari@usda.gov