

Tony Evers
Governor



DIVISION OF MEDICAID SERVICES

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March 17, 2020

Julie Mikkelson
Midwest Regional Director
Supplemental Nutrition Assistance Program
United States Department of Agriculture
77 West Jackson Blvd., 20th Floor
Chicago, Illinois 60604-3507

Dear Julie Mikkelson:

The Wisconsin Department of Health Services (DHS) is submitting a request to waive federal regulations found at 7 CFR 273.10(f)(3), 273.12(a)(5), 273.14, and 275.12(d)(2)(vii) to allow for the extension of all current SNAP (FoodShare) certification periods and periodic report form due dates by three months, starting with those due in March.

At this time, the United States and the State of Wisconsin have a shared priority of containing and reducing the transmission of COVID-19. Approval of this request would allow for the administrative flexibility needed for Wisconsin to protect the public health and the health of our staff and members, while ensuring households continue to receive their FoodShare benefits during this health crisis. This waiver would also allow us to align with our health care, child care, and TANF programs to ensure continuity of services across programs.

The waiver request is attached. We look forward to your response. If you have any questions, you or your staff may contact Courtney Harris at (608) 261-7804 or courtney.harris@dhs.wisconsin.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Rebecca McAtee".

Rebecca McAtee
FoodShare Director

cc: Courtney Harris, DMS/BEPS
Craig Hayes, DMS/BEPS
Julie Taylor, DMS/BEPS
Jayne Wanless, DMS/BEPS
Becky David, DMS/BEPS
Sulema Olivarez, FNS MWRO

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** Initial
3. **Regulatory citation:** 273.10(f)(3); 273.12(a)(5); 273.14; 275.12(d)(2)(vii)
4. **State:** Wisconsin
5. **Region:** MWRO
6. **Regulatory requirements:** The State agency must certify each eligible household for a definite period of time. State agencies must assign the longest certification period possible based on the predictability of the household's circumstances. The first month of the certification period will be the first month for which the household is eligible to participate. The certification period cannot exceed 12 months except to accommodate a household's transitional benefit period.

SNAP simplified reporting households certified for four months or more are subject to periodic reporting requirements. Elderly blind or disabled households with no earned income are exempt from the periodic report requirements.

SNAP (FoodShare) quality control reviews are a subsample of the SNAP caseload. All elements are subject to review.

7. **Description of alternative procedures:** Wisconsin proposes to extend all SNAP (FoodShare) certification periods by three months (3) beginning with re-certifications due by the end of March. Wisconsin also proposes to extend all periodic report form (Six month report form, SMRF) due dates by three months, starting with those due in March.
8. **Justification for request:** This request is justified pursuant to 7 CFR 272.3(c)(1)(ii) which permits FNS to authorize waivers that result in a more efficient and effective administration of the program. The approval of this waiver would allow for the administrative flexibility needed for Wisconsin to protect the public health and the health of our staff and members, while ensuring households continue to receive their SNAP (FoodShare) benefits during this health crisis. This waiver would also allow us to align with our health care, child care, and TANF programs to ensure continuity of services across programs.

Extending all FoodShare certification periods and Six month report forms by three (3) months will be beneficial to administrative staff as well as customers. Extending all certifications and six month report forms will also allow for the workload following the end of the waiver to be staggered.

Approval of this waiver will assist to reduce the spread of the Coronavirus disease (COVID-19) and avoid putting customer's health at risk by eliminating the need for customers to complete SNAP (FoodShare) redetermination applications, six month report forms, office visits, and scheduling interviews. Containing and reducing the transmission of COVID-19 is a priority of the United States and Wisconsin.

In addition, administrative staff will be able to concentrate on initial SNAP (FoodShare) applications and customers will be spared application completion and scheduled interviews. SNAP households in simplified reporting will continue to adhere to reporting requirements requiring income exceeding 130% FPL still be reported by the tenth (10th) of the month following the change. Simplified reporting household with a periodic report form requirement will have the due date extended by three months.

- 9. Anticipated impact on households and State agency operations:** Customers will continue receiving SNAP (FoodShare) benefits without interruptions. Administratively, the certification and six month report form extensions will assist in timely application processing of initial applications for new households.
- 10. Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):** Current SNAP (FoodShare) caseload is 307,643 households statewide. All SNAP (FoodShare) households would be subject to the extended due dates.
- 11. Anticipated implementation date and time period for which waiver is needed:**
March 17, 2020
- 12. Proposed quality control review procedures:** Quality Control (QC) is requesting to apply a held harmless period, exclusion of variance, for all cases pulled in the monthly sample in which the three month extension for re-certifications and six month reports was applied 275.12(d)(2)(vii).
- 13. State agency submitting waiver request and State contact person:**
Courtney Harris Courtney.Harris@dhs.wisconsin.gov
- 14. Signature and title of requesting official:**



Name: Rebecca McAtee MIPA
Title: Director, Bureau of Enrollment Policy and Systems,
FoodShare Director

Rebecca.mcatee@dhs.wisconsin.gov

15. Date of request: 03/16/2020

16. State agency staff contact (name/email/telephone): Courtney
Harris Courtney.Harris@dhs.wisconsin.gov 608-261-7804

17. Regional office contact person (to be completed by FNS regional office):
Sulema Olivarez ; Sulema.olivarez@usda.gov

cc: Courtney Harris, DMS/BEPS
Julie Taylor, DMS/BEPS
Dana Bax, FNS MWRO
Erica Kain, FNS MWRO
Sulema Olivarez, FNS MWRO