



Food and Nutrition
Service

1320 Braddock Place
Alexandria, VA
22314

August 10, 2020

Rebecca McAtee
Director, FoodShare
Department of Health Services
1 West Wilson Street
P.O. Box 309
Madison, Wisconsin 53701

RE: Supplemental Nutrition Assistance Program (SNAP) – Wisconsin Adjustment
Request for Adjusting Interview Requirements – Due to Novel Coronavirus
(COVID-19) Approval

Dear Ms. McAtee:

This letter transmits the approval of the Wisconsin Department of Health Services (DHS) request to adjust SNAP regulations at 7 CFR 273.2(a)(2), 7 CFR 273.2(e), and 7 CFR 273.14(b)(3) which require a household to complete an interview prior to approval or recertification, provided the applicant's identity has been verified and all other mandatory verifications in 7 CFR 273.2(f)(1) have been completed.

Under this adjustment (COV-177), the State will not be required to interview a household at initial application or recertification, provided that the applicant's identity has been verified and all other mandatory verifications have been completed. The State will be required to contact the household if any information on the application is questionable and cannot be verified. The State will make every attempt to verify household circumstances through data matching and mailing or uploading verifications to the State system.

The Food and Nutrition Service (FNS) is approving this adjustment under authorization of the Families First Coronavirus Response Act (P.L. 116-127) effective July 30, 2020 through August 31, 2020. FNS has determined this adjustment to be consistent with what is practicable under actual conditions in areas affected by the COVID-19 Public Health Emergency.

The approval is contingent upon the State agency's compliance with the conditions and data reporting components in item 11 of Enclosure 1 and are due 45 days after expiration (October 15, 2020). The detailed waiver response is enclosed.

FNS is responding rapidly to the COVID19 pandemic with multiple waivers and flexibilities in its programs. The Families First Coronavirus Response Act requires the Food and Nutrition Service to collect specific data elements from States. The CARES Act provides funding, for which FNS will collect information in order to distribute funding. Please prepare the necessary data elements to collect and submit this data as described in this document. The public will be given the opportunity to comment on this data collection, including legislatively-mandated data collection through a future information collection process being submitted to the Office of Management and Budget.

Please note that this approval may differ from the State's request. If you have questions or need additional information regarding this adjustment, please contact your respective Regional office representative.

Sincerely,

Sasha Gersten-Paal
Director
Program Development Division
Supplemental Nutrition Assistance Program

Enclosure

Enclosure 1

**ADJUSTMENT OF INITIAL CERTIFICATION AND
RECERTIFICATION INTERVIEW RESPONSE**

1. **Waiver serial number:** COV-177
2. **Type of request:** Initial
3. **Regulatory citation:** 7 C.F.R. 273.2(a)(2), 7 C.F.R. 273.2(e), and 7 C.F.R. 273.14(b)(3)
4. **State:** Wisconsin
5. **Region:** Midwest
6. **Regulatory requirements:** Supplemental Nutrition Assistance Program (SNAP) regulations at 7 C.F.R. 273.2(a)(2) requires that the application process include an interview.

Regulations at 7 C.F.R. 273.2(e) requires that the State agency interview households for eligibility before certifying.

Regulations at 7 C.F.R. 273.14(b)(3) requires that State agencies interview households as part of the recertification process.
7. **Description of alternative procedures:** The State will not be required to interview a household at initial application or recertification, provided that the applicant's identity has been verified and all other mandatory verifications in 7 C.F.R. 273.2(f)(1) have been completed. The State will be required to contact the household if any information on the application is questionable and cannot be verified. The State will make every attempt to verify household circumstances through data matching and mailing or uploading verifications to the State system.
8. **Action and reason for approval or denial:** The Food and Nutrition Service (FNS) recognizes the need for adjustments due to the COVID-19 Public Health Emergency. As authorized by the Families First Coronavirus Response Act (P.L. 116-127), FNS' approval of this adjustment is based on the determination that the adjustment is consistent with what is practicable under actual conditions in areas affected by the COVID-19 Public Health Emergency. FNS is approving the State's request effective July 30, 2020 through August 31, 2020.

9. Conditions and reasons: FNS is approving this adjustment subject to the following conditions:

- The adjustment is limited to those households for which mandatory verifications have been completed and the applicant's identity has been verified;
- The State agency will ensure that sufficient controls in their policy and automation are in place to implement the terms of this adjustment correctly;
- The State agency will contact the household if information in the application that is required to be verified under 273.2(f)(1) is questionable and cannot be verified through a data match;
- The State agency has the capacity to provide to FNS the data required for evaluation of the caseload for which the State agency has adjusted the interview requirements.

10. Evaluation Data Requirements

The State agency must provide to FNS the data and analysis listed below required for evaluation of this adjustment.

- Estimated number of households affected by this adjustment;
- A narrative on the effect of the adjustment on program access and client satisfaction, including an analysis of any client or advocate complaints received related to the adjustment procedure;
- A narrative on the effect of the adjustment on the provision of timely and accurate benefits; and
- A narrative on the effect of the adjustment on any other aspects of the eligibility process including the ability to manage staff caseload growth and the impact on administrative efficiency.

11. Expiration date: August 31, 2020

12. Quality control procedures: No special Quality Control (QC) procedures are required for cases subject to the provisions of this waiver. Cases should be reviewed using standard review procedures contained in the FNS Handbook 310.

13. Anticipated implementation date (*notify FNS if actual date differs*):
Upon receipt of approval.