

Tony Evers
Governor



DIVISION OF MEDICAID SERVICES

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Andrea Palm
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State of Wisconsin
Department of Health Services

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April 16, 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 disregard federal regulations found at 7 CFR 273.9 (b)(2)(ii) to allow for the exclusion of Federal Pandemic Unemployment Compensation (FPUC) income for SNAP (FoodShare) recipients.

During this unprecedented COVID-19 health emergency, the federal government has found there to be a sufficient need for the creation and issuance of a pandemic unemployment supplement. The emergency supplement will help low income families, and families who have recently lost their job do to COVID-19 continue to meet financial obligations such as housing and utility expenses. Disregarding this income for FoodShare recipients recognizes the importance of this benefit to individuals and local economies, while at the same time helping to ensure all eligible households continue to have access to SNAP benefits, which provide an important lifeline to one of our most basic human needs during this time. This disregard would also ease program administration by allowing Wisconsin to align SNAP policy with our health care programs. This additional administrative flexibility is essential during this time, due to the significant increase in applications resulting from this public health emergency and the need to achieve efficiencies wherever possible.

The State 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,

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
Erica Kain, FNS MWRO
Sulema Gordon, FNS MWRO

STATE WAIVER REQUEST

1. **Waiver Serial Number (if applicable):**
2. **Type of request:** Initial
3. **Regulatory citation:** 7 CFR 273.9 (b)(2)(ii)
4. **State:** Wisconsin
5. **Region:** MWRO
6. **Regulatory requirements:** (2) Unearned income shall include:
(ii) Annuities; pensions; retirement, veteran's, or disability benefits; worker's or unemployment compensation including any amounts deducted to repay claims for intentional program violations as provided in § 272.12; old-age, survivors, or social security benefits; strike benefits; foster care payments for children or adults who are considered members of the household; gross income minus the cost of doing business derived from rental property in which a household member is not actively engaged in the management of the property at least 20 hours a week.
7. **Description of alternative procedures:** Wisconsin proposes to continue to count the non-pandemic unemployment benefit amount received by a SNAP recipient, but to exclude any amount of unemployment authorized under the CARES Act and denoted as Federal Pandemic Unemployment Compensation (FPUC) \$600 for the duration of receipt.
8. **Justification for request:** During this unprecedented COVID-19 health emergency, the federal government has found there to be a sufficient need for the creation and issuance of a pandemic unemployment supplement. The emergency supplement will help low income families, and families who have recently lost their job do to COVID-19 continue to meet financial obligations such as housing and utility expenses. The additional pandemic unemployment should be disregarded, ensuring all eligible households continue to have access to SNAP benefits, which provide an important lifeline to one of our most basic human needs during this public health emergency.

Disregarding Federal Pandemic Unemployment Compensation (FPUC) benefits would also ease program administration by allowing Wisconsin to align SNAP policy with our health care programs. This additional administrative flexibility is essential during this time, due to the significant increase in applications resulting from this public health emergency and the need to achieve efficiencies wherever possible.

9. **Anticipated impact on households and State agency operations:** Current and new

SNAP households will continue receiving SNAP (FoodShare) benefits without interruptions or reductions. Administratively, this will allow all programs of assistance to align, resulting in a streamlined application process and significant efficiencies for staff.

- 10. Caseload information, including percent, characteristics, and quality control error rate for affection portion (if applicable):** SNAP (FoodShare) caseload is 313,825 households statewide as of March 2020. Unemployment rates for Wisconsin have gone up to 27%, seeing an additional 385,000 new claims since mid-March 2020.
- 11. Anticipated implementation date and time period for which waiver is needed:** Immediately upon approval and for the duration of receipt of FPUC.
- 12. Proposed quality control review procedures:** No impact to quality control review procedures.
- 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:** 04/15/2020
- 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):**

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