

Tony Evers  
Governor



**DIVISION OF MEDICAID SERVICES**

1 WEST WILSON STREET  
PO BOX 309  
MADISON WI 53701-0309

Andrea Palm  
Secretary

**State of Wisconsin**  
Department of Health Services

Telephone: 608-266-8922  
Fax: 608-266-1096  
TTY: 711

July 31, 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 utilize the flexibility that exists as authorized by section 2302 of the Families First Coronavirus Response Act (P.L. 116-127) to not require a household complete an interview at initial application or recertification, provided the applicant's identity has been verified and all other mandatory verifications in 7 C.F.R. 273.2(f)(1) have been completed.

At this time, the United States and the State of Wisconsin have a shared priority of containing and reducing the transmission of COVID-19. Wisconsin Governor Tony Evers declared a public health emergency in response to COVID-19 again on July 30, 2020. Governor Evers and the Department of Health continue to ask citizens to stay at home, limit interactions, and practice social distancing. As such, additional flexibility is required to support individuals in applying for and maintaining benefits while protecting the public health. Approval of this request would also provide the administrative flexibility needed to ensure agencies are able to continue efficiently processing cases during this crisis.

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](mailto: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  
Julie Taylor, DMS/BEPS  
Jayne Wanless, DMS/BEPS  
Becky David, DMS/BEPS  
Erica Kain, FNS MWRO  
Sheena Panoor, FNS MWRO  
Sulema Olivarez, FNS MWRO

## ADJUSTMENT OF INITIAL CERTIFICATION AND RECERTIFICATION INTERVIEW

1. **Waiver Serial Number (if applicable):** COV-126
2. **Type of request:** Extension
3. **Regulatory citation:** 7 C.F.R. 273.2(a)(2), 273.2(e), and 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. **Justification of request:**

This request is justified pursuant to section 2302 of the Families First Coronavirus Response Act (P.L. 116-127), which permits FNS to authorize waivers 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.

On July 30, 2020 Wisconsin's Governor Tony Evers declared a Public Health Emergency, via Executive Order #82 to be in effect until September 28, 2020.

As described in the order, Wisconsin is seeing new and significant community spread and increase in cases of COVID-19. Wisconsin has experienced a drastic rise in COVID-19 cases throughout the entire state, with 61 of 72 counties (84 percent) representing 96 percent of the state's population experiencing high COVID-19 activity. All regions of Wisconsin have high COVID-19 activity levels. This is a dramatic increase from where Wisconsin was in June, when only 19 of 72 counties (26%) were experiencing high COVID-19 activity.

The average number of new confirmed cases of COVID-19 has drastically increased throughout July, with an average of 556 new cases each day between July 1-7, an average of 764 new cases each day between July 8-14 (a 37% increase from the previous week), an average of 890 new cases each day between July 15-21 (a 16% increase from the previous week), and an average of 938 new cases each day between July 22-26 (a 5% increase from the previous week).

Wisconsinites continue to be asked to stay home, limit interactions, and practice physical distancing. Wisconsin's unemployment rate continues to be high, July 19-25 there were 22,832 new claimants for the week whereas in 2019 there were 3,427. Ongoing claims are at 208,873 per week compared to 2019 where there were 25,635.

With continued negative impacts to Wisconsin citizens, the demand for assistance remains high. We anticipate we will continue to see an increase in applications as this emergency continues. Approval of this request will support Wisconsin in complying with the public health and safety precautions recommended by health officials and described in the executive order, while providing the administrative flexibility needed to ensure agencies are able to continue efficiently processing cases during this crisis.

- 9. Anticipated impact on households and State agency operations:** By waiving the interview, agencies are better able to meet timeliness requirements despite significant increases in applications. Household will benefit from receiving their benefits expeditiously. Wisconsin also anticipates that by removing the interview requirement the number of inbound, outbound, and call wait times will decrease during the period of this adjustment. This allows for applicants and members who call in to be assisted timely
- 10. Caseload information, including percent, characteristics, quality control error rate for affected portion:** During the prior adjustment to interviews, approximately 34% of applications had the interview waived.
- 11. Anticipated implementation date and period for which waiver is needed:** July 30, 2020 through September 30, 2020.
- 12. Quality control procedures for review:** SNAP Quality Control reviews will follow the process laid out by FNS and the 310.

**13. State agency submitting waiver request and State contact person:** Wisconsin Department of Health Services, Rebecca McAtee, Director

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



Rebecca McAtee

FoodShare Director

[Rebecca.McAtee@dhs.wisconsin.gov](mailto:Rebecca.McAtee@dhs.wisconsin.gov)

**15. Date of request:** July 31, 2020

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

**17. Regional office contact person (to be completed by FNS regional office):**

**18. cc:** Courtney Harris, DMS/BEPS  
Julie Taylor, DMS/BEPS  
Jayne Wanless, DMS/BEPS  
Becky David, DMS/BEPS  
Erica Kain, FNS MWRO  
Sheena Panoor, FNS MWRO  
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