

Tony Evers
Governor



DIVISION OF MEDICAID SERVICES

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Andrea Palm
Secretary

State of Wisconsin
Department of Health Services

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March 18, 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 Ms. Mikkelson:

Wisconsin is devising strategies to reduce the spread of the Coronavirus disease (COVID-19). One of the strategies is to request a waiver of the general SNAP work requirements and ABAWD work requirement. This waiver request is to exempt all individuals subject to the general SNAP work requirement and as a result the ABAWD population statewide from all SNAP work requirements beginning March 2020 for a three month period.

Wisconsin believes that exempting FoodShare applicants and members from the general SNAP work requirement and the able-bodied adults without dependents (ABAWD) work requirement may aid in reducing the spread of COVID-19 and avoid putting workers', applicants', and members' health at risk by minimizing in-person contact between workers and applicants and members. It will also alleviate the nearly impossible task of meeting the work requirements during the COVID-19 pandemic as local organizations and government offices, businesses, schools, daycare centers close to the public.

Attached please find documentation to support our request. If you have questions, please contact Rebecca McAtee at Rebecca.McAtee@dhs.wisconsin.gov. We look forward to your response.

Sincerely,

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

Rebecca McAtee
Wisconsin FoodShare Director

STATE WAIVER REQUEST

1. **Waiver serial number:**
2. **Type of request:** Initial
3. **Regulatory citation:** 7 CFR 273.7(a), CFR 273.24(b)
4. **State:** Wisconsin
5. **Region:** MWRO
6. **Regulatory Requirements:**

Under 7 CFR 273.7(a) as a condition of FoodShare eligibility, all individuals must meet the general Supplemental Nutrition Assistance Program (SNAP) work requirements unless otherwise exempt. Applicants or members who do not comply with the work registration requirements are sanctioned from receiving FoodShare benefits detailed under 7 CFR 273.7(j).

Under 7 CFR 273.24 (b) individuals are ineligible to participate in the Supplemental Nutrition Assistance Program (SNAP), as a member of any household, if the individual received program benefits for more than three months during any 36-month period, while subject to but not meeting the SNAP work requirement for able-bodied adults without dependents (ABAWDs) detailed under 7 CFR 273.24(a). Regulations at 273.24(c) list the exemptions from the ABAWD work requirement which includes all exemptions from the general SNAP work requirements in 273.7(b).

7. **Description of Alternative Procedures:**

The State of Wisconsin requests to exempt all SNAP applicants and members from the general SNAP work requirements and ABAWD work requirement beginning March 2020 for a three month period during an outbreak of a respiratory disease caused by a novel coronavirus which has been detected in the United States including the State of Wisconsin. The CDC has indicated that there is no vaccine or treatment drug available for this disease.

8. **Justification for Request:**

Exempting SNAP applicants and members from the general SNAP work requirements and ABAWD work requirement will protect the health and safety of State eligibility workers, FoodShare Employment and Training (FSET) staff, and SNAP applicants and members.

Approval of this waiver will assist to reduce the spread of the Coronavirus disease (COVID-19) and avoid putting workers', applicants', and members' health at risk by minimizing in-person contact between workers and applicants and members. It will also alleviate the nearly impossible task of meeting the work requirements during the COVID-19 pandemic as local organizations and government offices, businesses, schools, daycare centers close to the public.

The CDC expects more cases to be detected across the country, including more instances of person-to-person spread in more states. Along with the entire population, individuals subject to the general SNAP work requirements and the ABAWD work requirement may be fearful of outbreaks in their communities which would prevent them from meeting the work requirements.

Governor Tony Evers issued a public health emergency on March, 12, 2020 due to COVID-19. As this situation unfolds, additional restrictions have been announced, including the closing of schools, bars, restaurants, and non-essential businesses, as well as a moratorium on holding gatherings of more than 10 people. These guidelines will have a direct impact on the ability for individuals to participate in work as well as participate in any training activities that would support work requirements.

9. Anticipated impact on households and State agency operations:

SNAP applicants and members will continue receiving SNAP benefits without interruptions during this time of need. State agencies, FSET agencies, and SNAP applicants and members will be better equipped to follow local, state, and federal guidance to isolate and stop the spread of COVID-19.

10. Caseload information, including percent, characteristics, and quality control error rate for affected portion:

Current SNAP (FoodShare) caseload is 307,643 households statewide. This waiver would apply to all individuals subject to a work requirement. Wisconsin may experience an increase in the number of applicants for FoodShare benefits and an increase in FoodShare benefit allotments as employers and local government offices close to protect the health and safety of their employees; and applicants and members lose jobs due to absences from work due to contracting COVID-19, exposure to COVID-19, and school and daycare closures.

11. Anticipated implementation date and time period for which waiver is needed:

March 18, 2020.

12. Quality control procedures for review:

QC will review cases following state policy and will find all individuals exempt from work requirements during this timeframe.

13. State agency submitting waiver request and State contact Person:

State Agency: Wisconsin Department of Health Services

Contact Person: Rebecca McAtee, FoodShare Director

14. Signature and title of requesting official:



Requesting Official: Rebecca McAtee

Title: FoodShare Director

Email for transmission of response: Rebecca.McAtee@dhs.wisconsin.gov

15. Date of request: March 18, 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):

cc: Courtney Harris, DMS/BEPS

Julie Taylor, DMS/BEPS

Kathleen Vieira, DMS/BEPS

Dana Bax, FNS MWRO

Erica Kain, FNS MWRO

Tina Kopec, FNS MWRO

Sheena Panoor, FNS MWRO