

March 7, 2008

2020071

Subject: FSP - Wisconsin Request to Modify Waiver of ABAWD Requirements under
7 CFR 273.24

To: Tim English, Regional Director
Food Stamp Program
Midwest Region

This is in response to your email on February 11, 2008, forwarding the Wisconsin State Agency's request to extend and modify its current ABAWD waiver #2020071 for 34 counties and seven cities within the state which exempts certain individuals from the work requirements of 7 CFR 273.24. The State bases its determination of insufficient jobs on U.S. Department of Labor data. Under the proposed waiver, residents of the counties and cities subject to the provisions of 273.24 would be exempt for a period of one year based on having unemployment rates more than 20 percent above the national average or belong to regions of the state that have an aggregate average unemployment rate that is at least 20 percent above the national average for a 24-month period prior to the date of the request. The State agency will use its 15 percent exemption allocations for the non-waived areas.

Our response is attached. Please contact Celeste Perkins of my staff at (703) 305-2507 if you have any questions.

SIGNED

Harriet Kornegay
Assistant Branch Chief
Certification Policy Branch
Program Development Division

Attachment

cc: All Regions w/attachments

WAIVER REQUEST

- 1. Waiver serial number:**
2020071
- 2. Type of request:**
Modification and Extension
- 3. Primary regulation citation, if any:**
Section 6 (o) of the Food Stamp Act, as amended by Section 824 of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996, P.L. 104-193.
- 4. Secondary regulation citation, if any:**
7 CFR 273.24 (f)(3)(iii)
- 5. State:**
Wisconsin
- 6. Region:**
MWRO
- 7. Regulatory requirements:**

Under 7 CFR 273.24(b) individuals are not eligible to participate in the Food Stamp Program as a member of any household if, during the preceding 36-month period, the individual received food stamp benefits for not less than 3 months (consecutive or otherwise), during which the individual did not work 20 hours or more per week, averaged monthly; participate in and comply with the requirements of a work program for 20 hours or more per week; or participate in and comply with requirements of a program under Section 20 or a comparable program established by the State.

Under 7 CFR 273.24(f), upon the request of a State agency, the Food and Nutrition Service (FNS) may waive the applicability of the above provision for any group of individuals in the State if the FNS makes a determination that the area in which the individuals reside has an unemployment rate of over 10 percent, or does not have a sufficient number of jobs to provide employment for the individuals.
- 8. Proposed procedures:**

The State of Wisconsin requests to waive individuals residing in four sub-regions within the state from the work requirements. Each one of these sub-regions is a contiguous part of one of the nine geographic regions served by Regional

Planning Commissions (RPCs). The RPCs are “formed by executive order of the governor and provide intergovernmental planning and coordination for the physical, social and economic development of a region.”¹

The State seeks waivers for contiguous regions and sub-regions that are eligible based on aggregate average unemployment rates of at least 20 percent above the national average during October 2005 through September 2007, when the national average unemployment rate plus 20 percent was 5.6.

Northwest Region:

Area	Unemployment Rate, OCT 05 – SEP 07	Area	Unemployment Rate, OCT 05 – SEP 07
Ashland County	5.9	Price County	5.3
Bayfield County	6.4	Rusk County	6.9
Burnett County	6.1	Sawyer County	6.5
Douglas County	5.1	Taylor County	5.3
Iron County	8.2	Washburn County	6.6
		Total for Region	5.9

Ashland, Bayfield, Burnett, Iron, Rusk, Sawyer, and Washburn Counties qualify based on having average unemployment rates of at least 20 percent above the national average for October 2005 through September 2007. Douglas, Price, and Taylor Counties qualify based on the area’s aggregate average unemployment rate, which is at least 20 percent above the national average for October 2005 through September 2007.

Sub-Region of North Central Region:

Area	Unemployment Rate, OCT 05 – SEP 07	Area	Unemployment Rate, OCT 05 – SEP 07
Adams County	6.6	Wood County	5.5
Juneau County	5.8	Total for sub-region	5.7

Adams and Juneau Counties qualify based on having average unemployment rates of at least 20 percent above the national average for October 2005 through September 2007. Wood County qualifies based on the area’s aggregate average unemployment rate, which is at least 20 percent above the national average for October 2005 through September 2007.

Sub-Region of West Central Region:

Area	Unemployment Rate, OCT 05 – SEP 07	Area	Unemployment Rate, OCT 05 – SEP 07
Barron County	5.7	Clark County	5.5
Chippewa County	5.3	Polk County	5.9
		Total for sub-region	5.6

Barron and Polk Counties qualify based on having average unemployment rates of at least 20 percent above the national average for October 2005 through September 2007. Chippewa and Clark Counties qualify based on the area’s

¹ Please refer to the following Internet site for more information on Wisconsin’s Regional Planning Commissions:
<http://www.dot.wisconsin.gov/projects/planorg/rpc.htm>

aggregate average unemployment rate, which is at least 20 percent above the national average for October 2005 through September 2007.

Sub-Region of Southeastern Region:

Area	Unemployment Rate, OCT 05 – SEP 07	Area	Unemployment Rate, OCT 05 – SEP 07
Kenosha County	5.4	Racine County	5.9
Milwaukee County	5.8	Washington County	4.3
Total for sub-region			5.6

Milwaukee and Racine Counties qualify based on having average unemployment rates of at least 20 percent above the national average for October 2005 through September 2007. Milwaukee and Washington Counties qualify based on the area's aggregate average unemployment rate, which is at least 20 percent above the national average for October 2005 through September 2007.

In addition, the State requests waivers for the following thirteen counties and seven cities. These areas are eligible based on their average unemployment rates, which are at least 20 percent above the national average during October 2005 through September 2007.

Area	Unemployment Rate, OCT 05 – SEP 07
Florence County	6.6
Forest County	6.8
Green Lake County	5.6
Jackson County	5.6
Langlade County	6.2
Lincoln County	5.7
Marinette County	6.5
Marquette County	6.0
Menominee County	10.6
Oconto County	6.2
Oneida County	6.0
Vilas County	6.1
Waushara County	5.6
Appleton city	5.9
Beloit city	7.6
Fond du Lac city	5.8
Green Bay city	6.9
Janesville city	5.7
Wausau city	5.6
West Bend city	6.1

9. Justification for request:

As stated in number 8 above, the areas listed above have an average unemployment rate of at least 20 percent above the national average during a recent 24-month time period. All of the raw data supporting our numbers that we have used are from the Bureau of Labor Statistics (BLS) website.

10. Anticipated impact on households and State agency operations:

This waiver will provide consistency for households and State agency operations in areas where unemployment remains higher than the national average.

11. Caseload information, including percent, characteristic, and quality control error rate for affected portion:

The caseload for these areas, as of November 2007, represents 82% of the caseload for the state. There are no quality control procedures involved

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

The State is requesting a one-year waiver from April 1, 2008 through March 31, 2009.

13. Proposed quality control review procedures:

There are no special quality control procedures needed in conjunction with this waiver.

14. Signature and title of requesting official:

15. Date of request:
