



Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

November 20, 2025

Autumn Arnold
Director
Bureau of Eligibility and Enrollment Policy
Department of Health Services
1 West Wilson Street
Madison, Wisconsin 53703

RE: Supplemental Nutrition Assistance Program (SNAP) – Wisconsin Request to Waive Able-Bodied Adults Without Dependents Time Limit – Initial – Partial Approval

Dear Director Kozlowski:

This is in response to the Wisconsin Department of Health Services, (DHS) July 3, 2025, request to waive the Supplemental Nutrition Assistance Program (SNAP) time limit for able-bodied adults without dependents (ABAWDs). The State agency requested to waive the time limit for ABAWDs in four individual counties and ten reservation areas. After careful review, the Food and Nutrition Services (FNS) is partially approving the request. The attached waiver response includes the approved areas, the supporting evidence used, and the conditions of approval.

DHS requested to waive four individual counties and ten reservation areas from October 1, 2025, to September 30, 2026, based on the requested areas demonstrating a lack of sufficient jobs. On July 4, 2025, President Donald J. Trump signed into law the [One Big Beautiful Bill Act of 2025](#) (OBBB). Section 10102 of the OBBB amends the criteria under which the Secretary may approve a State agency request to waive the time limit by removing the availability of waivers in areas where there is a lack of sufficient jobs to provide employment for the individuals. State agencies may now only request to waive areas with unemployment rates over 10 percent, aside from separate provisions for Alaska and Hawaii.

In the request, the State agency demonstrated a lack of sufficient jobs by providing evidence of unemployment rates 20 percent above the national average. The State agency may no longer use this criterion and evidence to support requests to waive the time limit. FNS reevaluated DHS' request to determine if the requested areas had an unemployment rate of 10 percent or greater for a 12-month period from March 2024 through February 2025. Using this criterion, only three of the requested reservation areas had a 12-month unemployment rate of 10 percent or greater. Therefore, FNS is approving DHS' request to waive the time limit in three reservation areas (Forest County Potawatomi Community and Off-Reservation Trust Land, Ho-Chunk Nation Reservation and Off-Reservation Trust Land, and Red Cliff Reservation and Off-Reservation Trust Land) and denying DHS' request to waive the time limit in the four individual counties and six reservation areas.

The State agency may reevaluate these areas based on the 10 percent criterion and resubmit a request for these areas at any time.

FNS reminds the State agency that section Sec. 10102 modifies the ABAWD exceptions to include new exceptions for “an Indian”, “Urban Indian” and “California Indian” as defined in the Indian Health Care Improvement Act. FNS also reminds the State agency that it must measure the 3-year period and track ABAWDs on a continuous basis, even in areas under a waiver. The State agency must continue tracking so that the State agency will be ready to transition off the waiver when it expires and reintroduce the time limit.

FNS expects that SNAP participants who can work, do work. ABAWDs may fulfill the ABAWD work requirement in several ways including by engaging for at least 80 hours a month in a work program. The SNAP Employment and Training (E&T) program is one of many ways that ABAWDs can meet this requirement and helps SNAP participants gain skills and find work that moves them toward self-sufficiency. Connecting participants to Wisconsin’s FoodShare Employment and Training supports our shared goal to lift millions of Americans out of dependency and into hopeful futures.

Please contact your Regional Office representative with any questions.

Sincerely,

DocuSigned by:

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Ronald Ward
Acting Associate Administrator
Supplemental Nutrition Assistance Program
Food and Nutrition Service
U.S. Department of Agriculture

Enclosure

Enclosure

**ABLE-BODIED ADULTS WITHOUT DEPENDENTS (ABAWD)
WAIVER RESPONSE**

- 1. Request Type:** Initial
- 2. Statutory Citation:** Section 6(o) of the Food and Nutrition Act of 2008
- 3. Regulatory Citation:** 7 CFR 273.24
- 4. State:** Wisconsin
- 5. Food and Nutrition Service (FNS) Region:** Midwest
- 6. Requirement:** Section 6(o) of the Food and Nutrition Act of 2008 and regulations at 7 CFR 273.24 provide that no individual shall be eligible to participate in the Supplemental Nutrition Assistance Program (SNAP) as a member of any household if the individual received program benefits for more than 3 months during any 3-year period in which the individual was subject to but did not comply with the ABAWD work requirement. Section 6(o) and 7 CFR 273.24 also provide that, upon the request of the State agency, the Secretary may waive the applicability of the 3-month ABAWD time limit for any group of individuals in the State if the Secretary 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.
- 7. Requested Area(s) and Support:** The State agency requested to waive the ABAWD time limit in four individual counties and ten reservation areas from October 1, 2025, to September 30, 2026. FNS is denying the State agency's request to waive the time limit in the four individual counties and approves the State agency's request to waive four of the ten reservation areas because the areas have an unemployment rate less than 10%.

The State agency supported its request for the four individual counties and eleven reservation areas based on the areas each having an unemployment rate that are at least 20 percent the national employment rate for 24-months. The State agency may no longer use this criterion and evidence to qualify for waivers of the time limit. FNS reevaluated Wisconsin's request using the available waiver criteria of an average unemployment rate of 10 percent or greater for a 12-month period. Using a 12-month period from March 2024 through February 2025, only three of the ten reservation areas qualified for a waiver.

The four individual counties did not have an unemployment rate 10 percent or above for the 12-month period of March 2024 through February 2025. The average unemployment rate for the counties was 5.3 percent or lower during the 12-month period (Table 1). Therefore, FNS is denying the State agency’s request to waive the time limit in these four individual counties.

Table 1: Counties (Bureau of Labor Statistics Local Area Unemployment Data, March 2024 – February 2025)

County	Unemployment Rate
Adams County	4.8%
Burnett County	4.7%
Iron County	5.0%
Menominee County	5.3%

Data extracted from <http://www.bls.gov> on September 4, 2025.

The average unemployment rate for the four reservation areas was 14.6 percent or greater during the 12-month period (Table 2). Therefore, FNS is approving the State agency’s request to waive the time limit in these three reservation areas.

Table 2: Reservation Areas (2023 American Community Survey and Bureau of Labor Statistics Data, March 2024 – February 2025)

Reservation Areas	Unemployment Rate
Forest County Potawatomi Community and Off-Reservation Trust Land	14.7%
Ho-Chunk Nation Reservation and Off-Reservation Trust Land	14.6
Red Cliff Reservation and Off-Reservation Trust Land	15.3%

Data extracted from <http://www.bls.gov> and <https://data.census.gov> on September 5, 2025.

The remaining seven reservation areas did not have an unemployment rate 10 percent or above for the 12-month period of March 2024 through February 2025. The average unemployment rate for the six reservation areas was 8.3 percent or lower during the 12-month period (Table 3). Therefore, these areas do not qualify for a waiver and FNS is denying the State agency’s request to waive the time limit in these areas.

Table 3: Reservation Areas (2023 American Community Survey and Bureau of Labor Statistics Data, March 2024 – February 2025)

Reservation Areas	Unemployment Rate
Bad River Reservation	8.0%

Lac Courte Oreilles Reservation and Off-Reservation Trust Land	5.7%
Lac du Flambeau Reservation	7.8%
Menominee Reservation and Off-Reservation Trust Land	6.2%
St. Croix Reservation and Off-Reservation Trust Land	8.7%
Sokaogon Chippewa Community and Off-Reservation Trust Land	9.8%
Stockbridge Munsee Community and Off-Reservation Trust Land	8.1%

Data extracted from <http://www.bls.gov> and <https://data.census.gov> on September 5, 2025.

- 8. FNS Action and Justification:** FNS is approving the State agency's request to waive the ABAWD time limit. The State agency's request meets the requirements for approval provided at 7 CFR 273.24(f) and relevant FNS guidance.
- 9. Authority:** The waiver is approved pursuant to section 6(o) of the Food and Nutrition Act of 2008 and 7 CFR 273.24(f).
- 10. Implementation Date:** October 1, 2025
- 11. Expiration Date:** September 30, 2026
- 12. Information Required to Submit a Modification, Extension, or New Waiver:** To receive a modification, extension, or submit a new waiver to replace the current waiver, the State agency must provide FNS with a formal request supported by data or other information as described in 7 CFR 273.24(f). Any request based upon unemployment rates must include data spreadsheets and supporting documentation.
- 13. State Agency Contact Information:**
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- 14. FNS Regional Office Contact Information:**
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