



Food and
Nutrition
Service

Park
Office
Center

3101 Park
Center
Drive

Alexandria
VA, 22302

Date: September 4, 2019

Deborah Waite
Deputy Bureau Director
Bureau of Enrollment Policy and Systems
Wisconsin Department of Health Services
1 West Wilson Street, PO Box 309
Madison, WI 53701-0309

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

Dear Ms. Waite:

This is in response to the Wisconsin State agency's May 28, 2019, request to waive the SNAP time limit for able-bodied adults without dependents in 16 areas from October 1, 2019, through September 30, 2020.

The State agency's request meets the requirements for approval provided at 7 CFR 273.24(f) and relevant Food and Nutrition Service (FNS) guidance. Therefore, FNS is approving the State to waive the time limit for a 12-month period as requested. The attached waiver response includes the approved areas, the supporting evidence used, and the conditions of approval. Please contact your FNS Regional Office with any questions.

As you may be aware, FNS has proposed regulations that would strengthen the standards by which areas can qualify for these waivers so that the statutory ABAWD work requirement is applied more broadly. The rule, once finalized, could change the qualifying areas and approval period for this waiver.

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 must continue tracking so that the State will be ready to transition off-of the waiver when it expires and reintroduce the time limit.

Moving forward, FNS will be taking actions to support the Administration's priority to provide able-bodied Americans a path to self-sufficiency. This goal requires that we establish a clear and mutual commitment to moving SNAP participants to meaningful employment.

Sincerely,

Sasha Gersten-Paal
Chief
Certification Policy Branch
Program Development Division

Able-Bodied Adults Without Dependents (ABAWD) Waiver Response

- 1. Serial Number:** 2150017
- 2. Request Type:** Initial
- 3. Statutory Citation:** Section 6(o) of the Food and Nutrition Act of 2008
- 4. Regulatory Citation:** 7 CFR 273.24
- 5. State:** Wisconsin
- 6. Food and Nutrition Service (FNS) Region:** Midwest
- 7. 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.
- 8. Requested Area(s) and Support:** The Wisconsin State agency requested to waive the ABAWD time limit in 6 counties and 10 reservations from October 1, 2019, through September 30, 2020. The State has considered some counties individually and combined others that are contiguous. The State agency supported its request for the 6 counties based upon these areas having an aggregate average unemployment rate 20 percent above the national average for the 24-month period of January 2017 through December 2018. The State agency supported its request for the 10 reservations based upon these areas having an aggregate average unemployment rate 20 percent above the national average for the 24-month period of March 2017 through February 2019. During both time periods, the national average unemployment rate was 4.1 percent; 20 percent above that rate is 4.9 percent. As shown in the following tables, the aggregate unemployment rates for the requested areas were 4.9 percent or greater during the selected time period.

Table 1: Combined Area 1 (Bureau of Labor Statistics Local Area Unemployment Data January 2017 through December 2018)

Counties
1. Ashland County
2. Bayfield County
3. Iron County
Combined Area Unemployment Rate: 4.9%
Data extracted from http://www.bls.gov on July 31, 2019

Table 2: Individual Counties (Bureau of Labor Statistics Local Area Unemployment Data January 2017 through December 2018)

Counties	Unemployment Rate
1. Adams County	4.9%
2. Forest County	4.9%
3. Menominee County	5.8%
Data extracted from http://www.bls.gov on July 31, 2019	

Table 3: Reservation Areas (American Community Survey and Bureau of Labor Statistics Data March 2017-February 2019)

Reservations	Unemployment Rate
1. Bad River Reservation	10.4%
2. Forest County Potawatomi Reservation	14.8%
3. Ho-Chunk Nation	7.3%
4. Lac Courte Oreilles	13.8%
5. Lac du Flambeau Reservation	7.4%
6. Menominee Reservation	6.5%
7. Red Cliff Reservation	10.8%
8. St. Croix Reservation	12.6%
9. Sokaogon Chippewa Community Reservation	20.1%
10. Stockbridge Munsee Community Reservation	5.4%
Data extracted from http://www.bls.gov and http://factfinder.census.gov on July 31, 2019.	

- 9. FNS Action and Justification:** FNS is approving the State agency to waive the ABAWD time limit as requested. The State agency's request meets the requirements for approval provided at 7 CFR 273.24(f) and relevant FNS guidance.
- 10. Authority:** The waiver is approved pursuant to section 6(o) of the Food and Nutrition Act of 2008 and 7 CFR 273.24(f).
- 11. Implementation Date:** October 1, 2019
- 12. Expiration Date:** September 30, 2020
- 13. Information Required for Amendment or Extension:** To receive an amendment or extension 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.
- 14. State Agency Contact Information:**
Name: Kathleen Vieira
Phone Number: 608-261-7832
Email: kathleen.vieira@dhs.wisconsin.gov
- 15. FNS Regional Office Contact Information:**
Name: Sheena Panoor
Phone Number: 312-886-5632
Email: sheena.panoor@usda.gov