



Date: July 31, 2026

DMS Operations Memo 26-28

To: Income Maintenance Supervisors
Income Maintenance Lead Workers
Income Maintenance Staff
FSET Agencies

Affected Programs:

- | | |
|---|---|
| ☐ BadgerCare Plus | ☐ Caretaker Supplement |
| ☒ FoodShare | ☒ FoodShare Employment and Training |
| ☐ Medicaid | |
| ☐ SeniorCare | |

From: Jonelle Brom, Bureau Director
Bureau of Eligibility Operations and Training
Division of Medicaid Services

Autumn Arnold, Bureau Director
Bureau of Eligibility and Enrollment Policy
Division of Medicaid Services

FoodShare 36-Month Certification Period Changes for Members Aged 60-64

CROSS-REFERENCE

- FoodShare Wisconsin Policy Handbook, [Sections 2.2.1.2 36 Month-Certification Period, 3.16.1 FoodShare Basic Work Rules, 3.17.1 FoodShare Work Requirements for ABAWDs](#)
- [Operations Memo 24-26, 36-Month Certification Periods for Certain Eligible FoodShare Households and New Option to Budget One-Time Medical Expenses](#)
- [Operations Memo 26-04, 2023 Fiscal Responsibilities Act Final Rule and H.R. 1 Expansion of the FoodShare Work Requirement](#)

EFFECTIVE DATE

August 8, 2026

PURPOSE

The purpose of this memo is to announce that food units with an individual aged 60 to 64 who does not have a disability will no longer qualify for a 36-month FoodShare certification period, due to new federal requirements.

BACKGROUND

Under current FoodShare policy, certain food units with no earned income and where all adult members are elderly, blind, or disabled, can be eligible to receive a 36-month certification period. Food units that

qualify for the 36-month certification period are not required to complete six-month report forms (SMRF) or an interview at their next renewal. However, these food units must complete an interview if there is pending verification or questionable information on the case at renewal. The 36-month certification period policy reduces administrative burden for food units that are unlikely to have a change in their household circumstances.

The One Big Beautiful Bill Act, H.R. 1 (2025), which was signed into law on July 4, 2025, increased the upper age limit from age 54 to age 64 for members who are able-bodied adults without dependents (ABAWDs), and are subject to the FoodShare work requirement. The United States Department of Agriculture's (USDA) Food and Nutrition Agency (FNA) recently provided new direction to states that restricts members who may now be subject to FoodShare work requirements from receiving 36-month certification periods.

POLICY

Food units with members under the age of 65 who are subject to the work requirement cannot be certified for 36 months. This means that members aged 60 to 64 without a disability no longer qualify for a 36-month certification period. With this federally required change, members without a disability can qualify for a 36-month certification period starting in the month they turn 65.

The policy applies to FoodShare applications and renewals received or pending on or after August 8, 2026.

Existing food units that do not meet the new criteria will keep their current 36-month certification period. However, the food unit will be required to complete SMRF(s) until their next renewal, and at renewal, must complete an interview. Food units will be sent a letter notifying them of their new SMRF requirement, including when their first SMRF is due. During the required interview, these food units must be screened for all exemptions to the FoodShare basic work rules and FoodShare work requirements.

CONTACTS

DHS CARES Problem Resolution Team

DHS/DMS/BEEP/AG

DHS/DMS/BEOT/JN