



Date: September 16, 2026

DMS Operations Memo 26-31

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 | |

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FoodShare Work Requirement Time Limit Suspension for High Unemployment Areas for Federal Fiscal Year 2027

CROSS-REFERENCE

- FoodShare Wisconsin Policy Handbook, [Section 3.17.1 FoodShare Work Requirements for ABAWDs](#)
- [Operations Memo 26-04, 2023 Fiscal Responsibilities Act Final Rule and H.R. 1 Expansion of the FoodShare Work Requirement](#)
- [Operations Memo 25-14, Changes to Exemptions and Time Limit Suspensions for FoodShare Work Requirements](#)

EFFECTIVE DATE

October 1, 2026

PURPOSE

This operations memo announces updates to the suspension of the FoodShare work requirement time limit for able-bodied adults without dependents (ABAWDs) who live in geographic areas that have an unemployment rate of over 10%.

BACKGROUND

Federal law requires FoodShare members who are ABAWDs to meet a work requirement to maintain FoodShare eligibility. FoodShare members who must meet the FoodShare work requirement can only receive FoodShare benefits for three months in the three-year FoodShare period if they do not meet the FoodShare work requirement. This policy is called the FoodShare Work Requirement for ABAWDs. Additional Wisconsin ABAWD policy details are available in the FoodShare Wisconsin Policy Handbook, [Section 3.17.1 FoodShare Work Requirements for ABAWDs](#).

The One Big Beautiful Bill Act, H.R. 1 (2025) was signed into law on July 4, 2025, and limits states' requests for a suspension to only be permissible if an area has an unemployment rate above 10% and removed the ability for a suspension of the FoodShare work requirement time limit to be approved based on lack of sufficient jobs.

H.R. 1 (2025) also included new exemptions for Tribal members and, in limited instances, descendants. [Operations Memo 25-14, Changes to Exemptions and Time Limit Suspensions for FoodShare Work Requirements](#), announced the implementation of these new exemptions for Tribal members effective October 1, 2025. [Operations Memo 26-04, 2023 Fiscal Responsibilities Act Final Rule and H.R. 1 Expansion of the FoodShare Work Requirement](#), provided additional details on the implementation of the new exemptions for Tribal members, Urban Indians, and California Indians.

POLICY

Effective October 1, 2026, through September 30, 2027, FoodShare ABAWD members who live in the following geographic areas will have the FoodShare work requirement time limit suspended due to unemployment rates higher than 10%:

TRIBAL RESERVATION AREAS

Members who live on Tribal lands and reservations belonging to:

- Forest County Potawatomi Community
- Ho-Chunk Nation
- Lac Du Flambeau Band of Lake Superior Chippewa Indians
- Red Cliff Band of Lake Superior Chippewa Indians
- St. Croix Chippewa Indians of Wisconsin
- Sokaogon Chippewa Community Mole Lake Band

ABAWD members who live on Tribal lands and reservations belonging to the following Tribal Nations will also have the time limit of the FoodShare work requirement suspended through use of additional federal flexibilities:

- Bad River Band of Lake Superior Chippewa Indians
- Fond du Lac Band of Lake Superior Chippewa Indians
- Lac Courte Oreilles Band of Lake Superior Chippewa Indians
- Menominee Indian Tribe of Wisconsin
- Oneida Nation
- Stockbridge-Munsee Community Band of Mohican Indians

Members living in any of the above geographic areas who are ABAWDs will not lose FoodShare eligibility if they do not meet the FoodShare work requirement during this period. All Tribal members, Urban Indians, and California Indians will continue to be exempt from the FoodShare work requirement.

All FoodShare applicants and members aged 18 to 64, including those living in a qualifying geographic area, must continue to be screened for qualifying exemptions from the FoodShare work requirement at application and renewal.

CONTACTS

DHS CARES Problem Resolution Team

DHS/DMS/BEEP/LW

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