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**State of Wisconsin  
Governor Jim Doyle**

**TO: Income Maintenance Supervisors  
Income Maintenance Lead Workers  
Income Maintenance Staff  
W-2 Agencies  
Workforce Development Boards  
Job Center Leads and Managers  
Training Staff  
Child Care Coordinators**

**FROM: Vicki Jessup  
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<b>BEPS/DFS OPERATIONS MEMO</b>					
<b>No: 10-80</b>					
<b>DATE: 11/15/2010</b>					
<b>FS</b>	<input checked="" type="checkbox"/>	<b>MA</b>	<input type="checkbox"/>	<b>BC+</b>	<input type="checkbox"/>
<b>SC</b>	<input type="checkbox"/>	<b>CTS</b>	<input type="checkbox"/>	<b>FSET</b>	<input type="checkbox"/>
		<b>BC+ CORE</b> <input type="checkbox"/>			
<b>CC</b>	<input type="checkbox"/>	<b>W-2</b>	<input type="checkbox"/>	<b>EA</b>	<input type="checkbox"/>
<b>CF</b>	<input type="checkbox"/>	<b>JAL</b>	<input type="checkbox"/>	<b>JC</b>	<input type="checkbox"/>
<b>RAP</b>	<input type="checkbox"/>	<b>WIA</b>	<input type="checkbox"/>	<b>Other</b>	<input type="checkbox"/> *
<b>EP</b>					

**SUBJECT: Student Eligibility for FoodShare**

**CROSS REFERENCE:** FSHB 3.15.1

**EFFECTIVE DATE:** Immediately

**PURPOSE:**

The purpose of this memo is to notify agencies of a new FoodShare policy for students enrolled in higher education.

**BACKGROUND:**

The federal Food & Nutrition Service (FNS) has issued guidance in response to questions raised by Quality Control reviews in several states, related to student eligibility for FoodShare benefits.

Federal regulations prohibit students enrolled at least half time in an institution of higher education from receiving FoodShare benefits unless specific exemptions are met. FNS has broadened the list of acceptable exemptions for certain students if the course of study has a direct link to employment and participation of the student in higher education is equivalent to

participating in an education activity that has been approved in the State FSET Plan. Education has been approved as an allowable component in the Wisconsin FSET State Plan.

### ***POLICY CHANGE:***

A student enrolled in higher education at least half time, who does not otherwise meet an exemption for eligible student status, may be eligible to receive FoodShare benefits if:

- The student is enrolled in a business, technical, trade, or vocational school that will result in obtaining a certificate or diploma in 2 years or less, and
- Obtaining the certificate or diploma will lead to employment that is in demand, and
- All other eligibility requirements for FoodShare are met.

Example 1: During an interview for FS, Jack, reports that he is a full time student at Northern Technical College for phlebotomy and plans to graduate in the next year. Since phlebotomists are in occupational demand, Jack is confident he will be able to obtain a job in his field upon graduation. Based on common knowledge that there is a shortage of trained medical professionals, the worker agrees. Jack is single and does not meet any of the other exemptions. If all other FS eligibility requirements are met, Jack would be an eligible student based on the new exemption reason.

Example 2: When Carla applies for FS, she reports that she is enrolled half time at Madison Area Technical College and is taking cooking with herbs, pottery and jewelry making. Carla indicates that she does not know if she'll attend next semester because she is unsure about her career goals. No other student exemptions are met. Carla would not be an eligible student, because the direction of Carla's potential career is unclear. Carla is encouraged to apply again if she disenrolls from school or if she pursues courses that will lead to a job in demand.

- **Note:** A student who lives in campus housing that offers a meal plan and the student gets more than half of their meals from the meal plan, is not eligible for FS.

### **VERIFICATION**

1. If a student fails to meet one of the existing exemption reasons, verification of enrollment in a program that can be completed in 2 years or less is required. This may include documents such as an enrollment letter, course schedule, financial aid papers, etc.
2. Verification that course completion has a direct link to employment that is in demand is required only if demand is not common knowledge to the worker. For example, many occupations in the health field are in demand and therefore do not need to be verified.

If the direct link to employment is unknown, several sources may be used as verification. This may include: literature from the school such as a brochure or online program information, collateral contact with Job Service, FSET, or an employment agency, by searching publications in newspapers or online, etc.

**IMPACT ON FSET**

Students enrolled in higher education at time of FS application and then found eligible for FS, may request to be referred to FSET to participate in activities other than education. These activities include job search, work experience or self employment. Using FSET funds for participant reimbursement related to education is not allowable for students who enroll in higher education prior to FS eligibility or for FS members who self initiate enrollment in higher education.

**CARES:**

Until CARES updates can be made to accommodate the new exemption, workers should answer 'Yes' to the 'Meets Caring for Dependent Children Requirement' on the School Enrollment Page in CWW for students who meet the criteria for the new exemption. Document the exemption reason in case comments.

**CONTACTS:**

BEPS CARES Information & Problem Resolution Center

\*Program Categories – FS – FoodShare, MA – Medicaid, BC+ – BadgerCare Plus, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – FoodShare Employment and Training, BC+ Core – BadgerCare Plus Core, CF – Children First, EA – Emergency Assistance, JAL – Job Access Loan, JC - Job Center Programs, RAP – Refugee Assistance Program, WIA – Workforce Investment Act, Other EP – Other Employment Programs.

DHS/DHCAA/BEPS/MR