

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Written comments provided by Carol W. Medaris on behalf of the Wisconsin Council on Children & Families

DWD 14.22 The dispute resolution process should contain provision for regular fair hearings for cases of reductions, suspension and termination of benefits.

DWD 14.22- Clients will continue to get notices of reduction, suspension and termination of benefits as they always have. A separate rule is not needed.

It should also address how advance notice and continuing benefits pending a hearing will be provided under the EBT system.

This information is covered in HA3, fair hearing rules. 14.22 was not revised.

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Written comments provided by Carol W. Medaris on behalf of the Wisconsin Council on Children & Families

How will expedited stamps be addressed?

The same rules for issuing food stamp coupons applies to EBT issuance. The rule was not revised.

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Written comments provided by Carol W. Medaris on behalf of the Wisconsin Council on Children & Families

Is it the state's intent to implement EBT as a pilot?

Yes. The Analysis section has been changed to note that EBT will be implemented in a pilot area before expansion statewide.

PUBLIC HEARING COMMENT & AGENCY RESPONSE  
 DEPARTMENT OF WORKFORCE DEVELOPMENT  
 DIVISION OF ECONOMIC SUPPORT

RULE NUMBER: DWD 14  
 RELATED TO: Electronic Benefit Transfer

HEARING LOCATION: Milwaukee  
 HEARING DATE: 1/28/99

Sup.	Opp.	For Info.	Exh. No.	Presenter, Group Represented, City & State	Comments/Recommendations	Agency Response
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Oral comments from Van Grafenstein representing Project SHARE of S.E. WI, INC.	Can Project SHARE outlets participate in the EBT system and how will that be accomplished?	Yes, they could participate through either manual vouchers or point-of- sale (POS) terminals depending on their food stamp volume and/or capability to support a POS. DWD and its EBT contractor will work closely with them to assure that they would be able to participate fully in the EBT system.
ADM-8287 (R.08/96)						

PUBLIC HEARING COMMENT & AGENCY RESPONSE

DEPARTMENT OF WORKFORCE DEVELOPMENT  
DIVISION OF ECONOMIC SUPPORT

RULE NUMBER: DWD 14  
RELATED TO: Electronic Benefit Transfer

HEARING LOCATION:  
HEARING DATE:

Commenting in Sup.	Opp.	For Info.	Exh. No.	Presenter, Group Represented, City & State	Comments/Recommendations	Agency Response
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	5	Written comments provided by Patricia Delessio on behalf of Legal Action of Wisconsin, Inc.	<p>1. DWD 14.03 requires mandatory participation. While the system must be mandatory when fully implemented statewide, regulations require that the state must implement EBT systems in a pilot area. The rules neglects to discuss the pilot area.</p> <p>2. DWD 14.13. There is no provision for the issuance of expedited food stamps, how it will be done and by whom. There is no provision for notice informing the client of the amount that will be available to them, by what date.</p>	<p>1. EBT will implement in a pilot area before expansion statewide. DWD added this information to the Analysis section.</p> <p>2. Disagree. The expedited issuance standards are the same for food stamp coupons and EBT. The client must receive the EBT card and have benefits posted within 7 days. Clients will receive a benefit notice at application, when benefits are reduced or when a supplement is issued as they do now. The EBT pamphlet will provide the availability date for monthly benefits. The rule was not revised.</p> <p>3. Agree. "For up to two months" is added after transaction history.</p>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Written comments provided by Patricia Delessio on behalf of Legal Action of Wisconsin, Inc.	<p>3. DWD 14.14. The EBT system must be capable of providing a transaction history for up to two months upon request.</p>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Written comments provided by Patricia Delessio on behalf of Legal Action of Wisconsin, Inc.		

Written comments provided by Patricia Delessio on behalf of Legal Action of Wisconsin, Inc.

4. It should be made clear that DWD 14.22 does not apply to the situation where monthly benefits are denied, terminated or reduced, or where a sanction is imposed. The household cannot be required to use a dispute resolution process. Once a decision has been made regarding replacement, the client must be provided a notice

Written comments provided by Patricia Delessio on behalf of Legal Action of Wisconsin, Inc.

5. The rules do not contain any provisions for notice to household when their account will be increased either because the agency discovered an underissuance or to comply with a fair hearing order.

4. Disagree. DWD does not intend to recreate rules for the ongoing processing of cases. This section specifically applies to EBT account transaction issues and requests for benefit replacement. The client will receive a notice when benefit replacement is denied. 14.22 was revised to state that the dispute resolution process ins not required before the household can request a hearing.

5. Disagree. CARES will continue to send a notice when supplementary benefits are issued or the benefit amount increases due to a fair hearing order. The rules were not revised.



# HUNGER TASK FORCE OF MILWAUKEE *Since 1974*

811 East Vienna Avenue  
Milwaukee, Wisconsin 53212  
414/962-3111  
Fax 414/962-3212

Tim Burnett  
State Department of Workforce Development  
Division of Economic Support  
P.O. Box 7935  
Madison, WI 53707-7935

Dear Mr. Burnett:

The Hunger Task Force of Milwaukee (HTFM) is an organization which has been working on food security issues for 25 years. Our organization provides emergency food to thousands of families and individuals in Milwaukee County each day. Many of the families we serve either have used or are using the Food Stamp Program. Therefore, we want to ensure that the proposed Electronic Benefit Transfer (EBT) system is easy to use and understand for our clients.

One of our concerns with the proposed project is the amount and extent of training for clients. In Milwaukee County, we have already seen the confusion and uncertainty created by a new welfare system. We know from our research in our food pantries and meal programs that many low-income individuals are still unsure how to access W-2. Moreover, our surveys indicate that there is confusion about who is eligible for Food Stamps and Medicaid as well as where to apply for these benefits. Conversion to EBT will require clear direction to clients regarding where to apply for benefits and how to use the card. In Milwaukee County, most individuals are being told to apply for Food Stamps and MA at W-2 agencies. We hope that the State and the W-2 agencies continue to promote this message consistently to avoid the type of confusion experienced by clients when W-2 went into effect.

Another issue related to training involves the actual usage of the EBT card. Users of the EBT card should receive "hands-on" training on the actual mechanics of how the system works. We are glad to see that one-on-one training is available if asked for by the client, and the videos and handout materials also are positive steps. However, we believe that the "newness" of the EBT system will still result in many situations where clients enter a retail store unsure about how the system will work and how much money they have on their card to spend for groceries. Therefore, we recommend that when clients enter a retail outlet, they have a specific location in the store to immediately determine their account balance. Moreover, there should be staff available at this location who can answer client's questions about the card and the transaction process. Whether this is a customer service center in larger grocery stores or a few checkout clerks at smaller retail outlets, there needs to be an on-site location where clients can get questions and concerns

*Exhibit 1*

answered before they purchase food. These safeguards will not only assist the client and make them feel more comfortable about using the EBT card; retailers will also benefit by having educated clientele who know how to use the card and are aware of their account balances, thus saving the store time, money, and much frustration.

A third concern of ours is how the EBT system will accommodate "non-traditional" food outlets such as SHARE sites and farmers' markets. As the organizer and promoter of the Milwaukee Farmers' Market Association (MFMA), Hunger Task Force of Milwaukee is aware of the increasing popularity of farmer's markets in Milwaukee and throughout the state. We also know that some markets within our Market Association engage in Food Stamp activity. Market operators, market vendors, and market clients need to be fully aware of the mechanics of the manual transaction process. Our Market Association will be heavily promoting its markets and products throughout Milwaukee County in 1999, and we therefore encourage the state to work with us and our Market Association to ensure that these increasingly popular outlets for fresh produce are fully accounted for within the new EBT system.

One final concern we have with the new EBT system relates to the cultural diversity of clients who use the Food Stamp Program. Certainly the individuals and families who use food stamps to supplement their diets come from a variety of backgrounds. We hope the State will work to ensure that the diversity of languages is taken into account during the creation of the informational pamphlets and videos. We encourage the State to remember that Wisconsin has an increasing number of Southeast Asian families, many of whom are poor and speak no English. In particular, we know that the Food Stamp Program is extremely important to Hmong and Laotian families who are settling throughout Wisconsin. Moreover, many of the farmers' market vendors in Milwaukee and within our Market Association speak little English. It is crucial to the success of the EBT system that the promotional materials and customer service options for both clients and retailers are sensitive to these cultural dynamics. Low-income families struggle daily to overcome poverty-related problems, and language barriers only make crisis situations more difficult. We urge the state to fully account for the diversity of populations who utilize the Food Stamp Program and ensure that the transition to another new service delivery system is a smooth one.

We look forward to working with the State to ensure the success of the EBT system. Please call us if you have any questions. Thank you.

Sincerely,



Jon Janowski  
Director of Advocacy  
Hunger Task Force of Milwaukee



2601 CROSSROADS DRIVE • SUITE 185 • MADISON, WI 53718 • 608/244-7150 • FAX 608/244-9030

January 21, 1999

**BRANDON SCHOLZ, PRESIDENT OF THE WISCONSIN GROCERS ASSOCIATION  
TESTIMONY ON DEPARTMENT OF WORKFORCE DEVELOPMENT PUBLIC HEARING ON  
RULES FOR EBT**

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Mr. Bernstein, members of the committee.

Thanks for the opportunity to allow the Wisconsin Grocers Association to provide input as you develop the rules relating to electronic benefits transfer.

As you may know, the Wisconsin Grocers Association has been working with state agency personnel on EBT since it was proposed. More specifically, over the past year and a half, we have worked very closely with Dick Mellinger and his staff through the original RFP, the RFI and the second RFP.

We have also worked together to work some of the kinks out the proposal to reach agreements so that the program can be launched in Wisconsin smoothly.

While there are a few issues that I want to note and put in place today, let me first take a minute to offer our thanks to Dick and his staff for their efforts to understand the concerns of retailers and to work to find solutions for our concerns. There is no question in my mind that the EBT program that is eventually brought on line in Wisconsin will reflect the conscious efforts of Dick and his staff making sure all the details are covered.

I have seven items that I want to highlight for you and if necessary, we can go back and discuss details if need be at the end of my remarks. These issues reflect items that we have discussed with the state and hope to have resolution relatively soon so that we don't have to take these issues into the legislative rule making process.

Item #1

The state has agreed to pay a transaction fee of \$.08 to those retailers who choose to use their own/leased POS equipment. We would like to have a monthly payment posting on the transaction fee, but we request that it be separate from the settlement on merchandise.

*Exhibit 2*

#### Item #2

We request that any transaction that is a manual transaction because the vendor's system has gone down be reimbursed at the rate of \$.08. The time and cost are significantly more on a manual transaction than they are for an electronic transaction. If providing voice authorizations and manual transactions are considered to be acceptable operating practices for the vendor, then a transaction fee for this food stamp transaction should be paid

#### Item #3

Many states have experienced many problems with denial transactions. It is our position that retailers should be reimbursed for denial transactions because it is a transaction that is initially created by a food stamp purchase. The fact that the transaction was denied because the customer did not have a sufficient balance does not mean that it did not cost us something to do that. The fact is that it does. Furthermore, if the receipt indicates that there is a balance less than the goods on the checkout, most likely, the customer would have those items re-rung (or taken out of the sub-total depending on whether or not we are dealing with an integrated check-out system or stand-alone machines). For that specific event, we have logged two food stamp transactions - without a denial transaction, we would only be reimbursed for one transaction, thus violating the federal condition that retailers cannot be required to incur increased costs.

#### Item #4

In the context of the denial transaction fee, it would make sense for the state to place a state terminal in stores using their own equipment, and an extra terminal for those that choose state equipment so that recipients could check their balance prior to doing their shopping. These terminals could also be used as a back up (for owned/leased POS equipment retailers) if the third-party processor went off-line. At a minimum, the state should consider placing a dedicated line and telephone in the store that could be accessed to determine an EBT balance.

#### Item #5

The Wisconsin Grocers Association will provide the state a sample retailer agreement that was previously drafted. We hope that we will have continued input into that agreement before it is formalized.

#### Item #6

We have discussed the requirement that the state provide terminals to Illinois retailers to service Wisconsin recipients. Without getting into the interoperability nightmare caused by the federal government, we are concerned with this specific requirement. As it stands today, we are aware of the concern that the state of Illinois is discriminating against Wisconsin retailers and the placement of terminals in their store. We would request that before Wisconsin places terminals in Illinois stores (or any other bordering state), that those states will have already placed terminals in Wisconsin stores. Furthermore, we want to make sure that all Wisconsin retailers have their systems up and running before we worry about a non-Wisconsin border store.



Item #7

As I indicated at the beginning of my remarks, we have developed an excellent working relationship with Dick Mellinger and his staff. We also know that once the vendor contract is signed, that DWD assumes the implementation phase. We would hope that an arrangement would be incorporated to allow Dick to play a leadership role in the transition and implementation phases. That would afford DWD the opportunity to bring a project manager on board who would be able to learn the system during implementation and the pilot phase. Clearly, experience and institutional knowledge will be a key element in making sure EBT gets off the ground in Wisconsin.

These are main points that I wanted to bring to your attention today. I am hopeful that we can agree on these issues quickly as well as any others that may come up as we move forward on the EBT program.

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# MEMORANDUM

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**DATE:** January 26, 1999  
**TO:** Judy Woelfel  
DWD  
**FROM:** Lou Dunlap  
DHA  
**RE:** EBT Draft Rules

Thank you for the opportunity to look at the proposed rules. In addition to a couple of minor questions, we have some significant questions and concerns regarding the dispute resolution process.

## Liability for Lost Benefits

### DWD 14.18 & .08

What exactly does "liability for lost benefits" mean? I assume it means the recipient cannot get FS replaced when they lose the card or give it to someone and FS are wrongfully issued. If my assumption is correct, why not say so? "Liability" sounds like the recipient is liable to the program for benefits wrongfully accessed, i.e., must repay the program.

### DWD 14.12(2)

"The recipient is expected to retain the last receipt and have it available..." What is this about? It will frequently not happen, so what are the consequences?

### DWD 14.22

1. The reference to "HSS 225" should be changed to "HA 3". This is DHA's new rule governing procedure for "fair hearings" and replaces HFS 225. We just had the public hearing; HFS 225 should be deleted sometime in the near future.
2. The food stamp regulations at 7 C.F.R. s. 273.15(a) provide for a fair hearing "...to any household aggrieved by any action of the State agency which affects the participation of the household in the program." Has this been waived for the EBT program? The rule appears to make use of the "dispute resolution process" a mandatory precursor to the hearing. Although the regulations at 7 C.F.R. s. 273.15(d) provide that an "agency conference" may be offered to any household

*Exhibit 3*

adversely affected by an agency action, this is optional and "...shall in no way delay or replace the fair hearing process."

3. There is no time frame governing the dispute resolution process. Does the 90 day limit in the regulations for the FS program apply? This brings us back to the issue of whether the customer is required to use the "dispute resolution process". If so, does the 90 days run from the "decision" of customer service, or from the "decision" from the dispute resolution process? How would DHA know when customer service's decision was made?

4. Is there any promptness requirement for contact with customer service? If the recipient complains about benefits lost 6 months ago, are they timely for "dispute resolution" purposes? If replacement of benefits were denied at that point, and they ask for a hearing 89 days later, are they timely?"



"For these are all our children . . . we will all profit by, or pay for, whatever they become." James Baldwin

February 5, 1999

FAXED and Mailed

Tim Burnett  
Department of Workforce Development  
Division of Economic Support  
P.O. Box 7935  
Madison, WI 53707-7935

Re: Proposed rules relating to an electronic benefit transfer system for food stamps

Dear Mr. Burnett,

I wish to make the following comments on the proposed rule relating to an electronic benefit transfer system for food stamps:

DWD 14.04 This section on issuing the card should contain time limits within which the card must be issued, in order to make sure that the applicant has access to benefits within the federal 30-day time limit.

DWD 14.09 This section on training should include some attention to food retailers who do not have POS equipment, for example farmers' market sellers and some small neighborhood stores. There should be a requirement to develop materials for such retailers to cover, for example, how to access the retailer customer service system, the retailer's potential liability, if any, and what to do if the EBT system is unavailable. Such materials should be widely distributed in order to ensure access under the new system by recipients.

DWD 14.16 and DWD 14.18 It is unclear how these two sections will work. Is it the Department's intent to provide the card within 5 business days as well as the benefits remaining in the participant's account from the point the loss is reported? If so, that appears to be consistent with federal time limits for replacing lost benefits. If not, the rule should state that benefits will be replaced at least within the 10 day federal time limit (7 CFR 274.6(d)). In any case, this procedure should be clarified in the rule.

RESEARCH • EDUCATION • ADVOCACY

16 N. Carroll Street • Suite 320 • Madison, WI 53703 • (608) 284-0580 FAX (608) 284-0583  
www.wccf.org

Exhibit 4

WCCF Comments: EBT rule  
February 5, 1999  
Page 2

Also, when the card is replaced, the recipient should be provided with notice of the amount of benefits remaining in the account.

The liability section should include some provision for dealing with times when a person is unable to access the recipient customer line. Although it is planned to run continually, there are bound to be times when access is denied. The rule should provide for that here (as it does for vendors in DWD 14.12(3)).

The last sentence in this section sounds like a person has to go through the dispute resolution process every time that benefits are lost. That cannot be the intent.

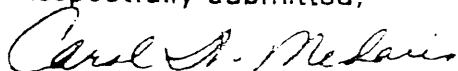
DWD 14.22 The dispute resolution process given here is incomplete. It should contain provisions for regular fair hearings for cases of reductions, suspensions and terminations of benefits. It should then make clear the distinction between these types of cases and those involving "EBT account transaction issues" and "requests for benefit replacement" which would apparently go through an initial dispute resolution process at the local agency level prior to the fair hearing process.

The section should also address how advance notice and continuing benefits pending a hearing will be provided under the EBT system.

In addition to these specific comments, there are two other matters not addressed in the rules at all. First, the rule does not address how expedited stamps are going to be provided pursuant to federal requirements and time limits.

Second, the federal rule at 7 CFR 274.12(b) seems to require that states implement an EBT program initially as a pilot before expanding it statewide. That would seem wise, to provide a chance to work out any problems prior to expanding coverage. Is that what the state intends? If so, that plan does not appear in any of the materials accompanying the proposed rule.

Respectfully submitted,



Carol W. Medaris  
Project Attorney

# LEGAL ACTION OF WISCONSIN, INC.

230 West Wells Street · Room 800 · Milwaukee, Wisconsin 53203

414/278-7722

FAX 414, 278-7156

Kenosha Office  
508 56th Street  
Kenosha, WI 53140  
414/654-0114

Madison Office  
31 South Mills Street  
P.O. Box 259686  
Madison, WI 53725-9686  
608/256-3304

February 5, 1999

Office of Legal Counsel  
Department of Workforce Development  
P. O. Box 7946  
Madison, Wisconsin 53707

Dear People:

The following comments are submitted in response to the DWD proposed rules regarding an electronic benefit transfer system for food stamp benefits.

1. DWD 14.03 requires mandatory participation. While the system must be mandatory when fully implemented, federal regulation requires that initially a state must implement EBT systems in a pilot area. 7 C.F.R. §274.12(b). The proposed rules neglects to discuss how this will be done.
2. DWD 14.13 discusses benefit availability dates. There is no provision for the issuance of expedited food stamps, how it will be done and by whom. In addition, there is no provision for notice informing recipients of the amount that will be available to them, by what date.
3. DWD 14.14 relates to customer service. Federal regulation provides that a state agency must ensure that the EBT system is capable of providing a transaction history for up to two calendar months upon request. The proposed regulation is more limited and should be amended to conform to federal regulation.
4. DWD 14.22 pertains to resolution of disputes. This section is not clear. 7 C.F.R. §273.15 provides that a food stamp household aggrieved by any action of the state agency which affects the household's participation in the food stamp program shall have access to a fair hearing. It should be made clear that

*Exhibit 5*

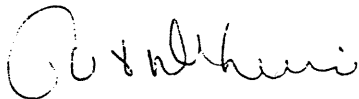
Office of Legal Counsel  
February 5, 1999  
Page Two

DWD 14.22 does not apply to the situation where monthly benefits are denied, terminated or reduced, or where a sanction is imposed. In addition, while a household can be required to report the loss of a card or benefits, and to wait for a response from the agency as to whether replacement will be made, he or she can not be required to use a dispute resolution process. Once a decision is made regarding replacement, notice should be provided and the household has the right to request a fair hearing.

5. The rules do not contain any provision for notice to households when their account will be increased, either because the agency discovered an underissuance or to comply with a fair hearing order. Without notice of the issuance of supplementary benefits, a household may be unaware of such and compliance with hearing orders may be in question.

Your attention to these comments is appreciated.

Very truly yours,



Patricia DeLessio  
Attorney at Law

PDL/eca

# RESPONSE TO LEGISLATIVE COUNCIL CLEARINGHOUSE REPORT

## Department of Workforce Development

CLEARINGHOUSE RULE NO.: 98-201  
RULE NO.: DWD 14  
RELATING TO: Electronic Benefit Transfer

Agency contact person for substantive questions.

Name: Judy Woelfel  
Title: Program and Planning Analyst  
Telephone No. 266-3747

Legislative Council report recommendations accepted in whole.

Yes  No

1. Review of statutory authority (s.227.15(2)(a))
  - a.  Accepted
  - b.  Accepted in part
  - c.  Rejected
  - d.  Comments attached
  
2. Review of rules for form, style and placement in administrative code (s.227.15(2)(c))
  - a.  Accepted
  - b.  Accepted in part
  - c.  Rejected
  - d.  Comments attached



3. Review rules for conflict with or duplication of existing rules (s.227.15(2)(d))
- a.  Accepted
  - b.  Accepted in part
  - c.  Rejected
  - d.  Comments attached
4. Review rules for adequate references to related statutes, rules and forms (s.227.15(2)(e))
- a.  Accepted
  - b.  Accepted in part
  - c.  Rejected
  - d.  Comments attached
5. Review language of rules for clarity, grammar, punctuation and plainness (s.227.15(2)(f))
- a.  Accepted
  - b.  Accepted in part
  - c.  Rejected
  - d.  Comments attached
6. Review rules for potential conflicts with, and comparability to, related federal regulations (s.227.15(2)(g))
- a.  Accepted
  - b.  Accepted in part
  - c.  Rejected
  - d.  Comments attached
7. Review rules for permit action deadline (s.227.15(2)(h))
- a.  Accepted
  - b.  Accepted in part
  - c.  Rejected
  - d.  Comments attached

## **Comments on Clearinghouse Report to Agency on Rule 98-201, DWD 14**

### 5. Clarity, grammar, punctuation and plainness

f. specify how long the hold on card access will be in place. Changed "hold" on card access, to "disable" card access.

j: Specified \$40 in 14.12(3)(a) and 30 days in 14.12(3)(b). In 14.13, the day and time will be provided by the local agency based on when they issue an emergency EBT card. The specified times have not been finalized.

# FINAL REGULATORY FLEXIBILITY ANALYSIS

## Department of Workforce Development

CLEARINGHOUSE RULE NO. : CR 98-201  
RULE NO.: DWD 14  
RELATING TO: Electronic Benefit Transfer

Final regulatory flexibility analysis not required. (Statement of determination required.)

1. Reason for including or failing to include the following methods for reducing impact of the rule on small businesses: Less stringent compliance or reporting requirements; less stringent schedules or deadlines for compliance or reporting requirements; simplification of compliance or reporting requirements; establishment of performance standards to replace design or operational standards; exemption from any or all requirements.

The rule will affect retail food stores authorized by the USDA Food and Nutrition Service to accept food stamps. DWD will afford all authorized retailers the opportunity to participate in the EBT system. As DWD's agent, the EBT services vendor will arrange for authorized retailers with owned or leased point of sale (POS) terminals to use the equipment for EBT transactions. During the first two years of EBT operations, the department shall pay a fee of \$.08 per food stamp purchase and merchandise return transaction conducted on POS terminals owned or leased by retailers which have signed an agreement with the EBT vendor to use such equipment. The department shall also commission a study to determine actual EBT costs incurred by retailers.

As an alternative, the vendor may supply EBT-only POS equipment to authorized retailers in accordance with federal regulatory requirements. Under a federal waiver, the vendor may not provide a POS terminal to retailers with less than \$100 per month in food stamp redemption activity. Retailers who do not have a POS terminal will use a manual voucher system. Also, non-traditional retailers such as route vendors and farmer's markets without access to telephone lines may use the manual voucher system.

2. Issues raised by small businesses during hearings, changes in proposed rules as a result of comments by small businesses and reasons for rejecting any alternatives suggested by small businesses.

The issues raised by the Wisconsin Grocers Association and the responses of DWD are contained in the written summary of public hearing comments and agency response, included with this filing.

3. Nature and estimated cost of preparation of any reports by small businesses.

See #4 below.

4. Nature and estimated cost of other measures and investments required of small businesses.

(1) A manual voucher system is required if the retailer does not have a POS device or if the POS device is not useable. The manual voucher must be submitted for payment within a specified amount of time. (2) An agreement for EBT services between the retailer and the EBT vendor is required. (3) Employee training which includes technical training on the specific EBT equipment in the retailer's store, manual procedures, reversals, adjustments, corrections, and accessing the retailer customer service helpline. (4) Reconciliation of transaction data.

5. Additional cost to agency of administering or enforcing a rule which includes any of the methods in 1. for reducing impact on small business.

None.

6. Impact on public health, safety and welfare caused by including any of the methods in 1. for reducing impact on small businesses.

None.

**FISCAL ESTIMATE WORKSHEET**

**1997 Session**

Detailed Estimate of Annual Fiscal Effect  
DOA-2047 (R 07 97)

ORIGINAL  UPDATED  
 CORRECTED  SUPPLEMENTAL

LRB or Bill No./Adm. Rule No.  
DWD 14

Amendment No.

Subject  
Electronic benefit transfer

I. One-time Costs or Revenue Impacts for State and/or Local Government (do not include in annualized fiscal effect):  
\$0

II. Annualized Costs:	Annualized Fiscal impact on State funds from:	
A. State Costs by Category	Increased Costs	Decreased Costs
State Operations - Salaries and Fringes	\$0	\$ -0
(FTE Position Changes)	( FTE)	(- FTE)
State Operations - Other Costs		-
Local Assistance		-
Aids to Individuals or Organizations		-
<b>TOTAL State Costs by Category</b>	<b>\$0</b>	<b>\$ -0</b>
B. State Costs by Source of Funds	Increased Costs	Decreased Costs
GPR	\$	\$ -
FED	.	-
PRO/PRS		-
SEG/SEG-S		-
III. State Revenues - Complete this only when proposal will increase or decrease state revenues (e.g., tax increase, decrease in license fee, etc.)	Increased Rev.	Decreased Rev.
GPR Taxes	\$	\$ -
GPR Earned		-
FED		-
PRO/PRS		-
SEG/SEG-S		-
<b>TOTAL State Revenues</b>	<b>\$0</b>	<b>\$ -0</b>

**NET ANNUALIZED FISCAL IMPACT**

	<u>STATE</u>	<u>LOCAL</u>
NET CHANGE IN COSTS	\$0	\$0
NET CHANGE IN REVENUES	\$0	\$0

Agency/Prepared by: (Name & Phone No.)  
DWD/ASD Howard Bernstein 266-9427

Authorized Signature/Telephone No.  
*Howard Bernstein* 266-9427

Date  
12/14/98

FISCAL ESTIMATE  
DOA-2048 E (R 07/97)

x ORIGINAL       UPDATED  
 CORRECTED     SUPPLEMENTAL

LRB or Bill No./Adm. Rule No.  
DWD 14

Amendment No. if Applicable

Subject  
Electronic benefit transfer

Fiscal Effect

State:  No State Fiscal Effect

Check columns below only if bill makes a direct appropriation or affects a sum sufficient appropriation.

Increase Costs - May be possible to Absorb Within Agency's Budget  Yes  No

Increase Existing Appropriation       Increase Existing Revenues  
 Decrease Existing Appropriation       Decrease Existing Revenues  
 Create New Appropriation

Decrease Costs

Local:  No local government costs

1.  Increase Costs  
     Permissive     Mandatory  
2.  Decrease Costs  
     Permissive     Mandatory

3.  Increase Revenues  
     Permissive     Mandatory  
4.  Decrease Revenues  
     Permissive     Mandatory

5. Types of Local Governmental Units Affected:  
 Towns       Villages       Cities  
 Counties     Others \_\_\_\_\_  
 School Districts     WTCS Districts

Fund Sources Affected

GPR    FED    PRO    PRS    SEG    SEG-S

Affected Ch. 20 Appropriations

Assumptions Used in Arriving at Fiscal Estimate

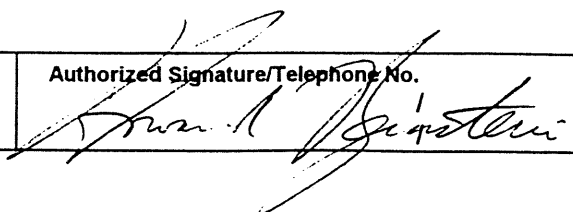
All cost assumptions for the state and local governments for this program were included in the legislation which created sec. 49.129, Stats. (1995 Act 368). There are no additional costs for state government or local governments as a result of the promulgation of these administrative rule changes.

Long-Range Fiscal Implications

None.

Agency/Prepared by: (Name & Phone No.)  
DWD/ASD Howard Bernstein 266-9427

Authorized Signature/Telephone No.



Date

12/14/98