FoodShare



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FoodShare

The federal supplemental nutrition assistance program (SNAP) provides federally funded benefits to low-income households to buy food. In Wisconsin, the program is referred to as Food-Share Wisconsin, or simply FoodShare.

The program is administered jointly by the federal, state, and local governments. At the federal level, the Food and Nutrition Service (FNS) in the U.S. Department of Agriculture (USDA) funds benefit payments, monitors state compliance with federal program rules, and oversees participating retailers. In Wisconsin, the Department of Health Services (DHS) administers the program by contracting with income maintenance (IM) consortia and tribes to perform program enrollment and caseload management functions, provide electronic benefit card services to enrollees, and ensure compliance with federal requirements. In Milwaukee County, DHS conducts these functions.

In June, 2014, approximately 840,000 individuals, representing 15% of Wisconsin's total population, lived in households that received Food-Share benefits. Of these individuals, 41 percent were minors and 21 percent were elderly, blind or disabled. Appendices I and II provide information on FoodShare participation and benefits expenses for calendar years 2009 through 2013.

Eligibility

Federal law establishes financial and nonfinancial program eligibility requirements, but provides options for states with respect to establishing eligibility standards.

Financial Eligibility. Federal law permits in-

dividuals and households to qualify for SNAP benefits in one of two ways. First, applicants may qualify if they meet income and resource limits specified in federal law. Second, individuals may qualify for SNAP benefits automatically because they have been determined to be eligible for other public assistance programs, a method commonly referred to as "categorical eligibility."

Federal Standards. States may choose to adopt federally-specified income and resource limits. In those states, households must have net income less than 100% of the federal poverty level (FPL) and gross income below 130% of the FPL. Net income is calculated by applying several federally-allowable deductions.

In addition, households may not have countable (liquid) assets that exceed specified levels. In federal fiscal year (FFY) 2014-15, the asset limit is \$2,250. The value of a home is not counted as an asset. States may also exclude the value of certain assets, such as the value of a household vehicle.

Categorical Eligibility. A state must also provide categorical eligibility for SNAP benefits to households that receive cash assistance funded from the federal temporary assistance for needy families (TANF) program, the supplemental security income (SSI) program, or a state's general assistance program, as long as the household's net income does not exceed 100% of the FPL.

In addition, states have the option to provide broader categorical eligibility by making all households with incomes up to 200% of the FPL that receive a nominal TANF-funded benefit categorically eligible for FoodShare. In 2014, 41 states, two territories and the District of Columbia provided this "broad-based categorical eligibility." States use benefits, such as brochures or a referral

to a job service or human services department, to provide this eligibility.

Wisconsin's FoodShare program implements broad-based categorical eligibility. Households with gross income up to 200% of the FPL may qualify if they receive a referral to Job Center of Wisconsin employment services, a Department of Workforce Development job search program partially funded by TANF.

Table 1 shows the 200% FPL threshold for calendar year 2014 at various household sizes. The FPL guidelines are updated annually.

Table 1: Categorical Eligibility Threshold (Effective October, 2014 through September 30, 2015)

Household Size	Annual Gross Income Threshold 200% of FPL
1	\$23,352
2	31,464
3	39,600
4	47,712
5	55,824
6	63 960

As of June, 2014, 819,169 of the 840,352 individuals that received FoodShare benefits (97.5%) qualified for FoodShare under categorical eligibility standards. While a household may be categorically eligible for FoodShare, the household may not receive a FoodShare benefit if their income level exceeds the maximum that qualifies the household for a benefit.

Households with an Elderly, Blind or Disabled (EDB) Member. An exception to the categorical eligibility requirements applies to households with an elderly, blind or disabled member. For these households, there is no limit on gross income, but the household must have net income of no more than 100% of the FPL to qualify for FoodShare.

In addition, an asset test applies to households

that include an elderly, blind, or disabled member and have gross income over 200% of the FPL. These households may not have more than \$3,250 in countable assets, although many assets such as vehicles or retirement savings accounts do not count towards that limit.

Nonfinancial Eligibility. In addition to the financial criteria, FoodShare participants must meet certain nonfinancial requirements.

Citizenship. Only citizens of the United States and legal immigrants who meet certain conditions may receive SNAP benefits. Undocumented immigrants are not eligible for FoodShare. Applicants must provide a social security number for all members of the household, and provide all other information necessary for determining eligibility.

From 1998 through 2011, Wisconsin provided state-funded benefits to certain legal immigrants who lived in the United States fewer than five years, making them ineligible for federal benefits. However, the 2011-13 biennial budget act eliminated this program. Consequently, legal immigrants may qualify for FoodShare benefits only if they have lived in the United States for five years or more.

Residence. All FoodShare participants must be residents of Wisconsin. Eligibility workers determine residency based on a set of guidelines, with a wide range of documents accepted to verify residency, including a rent receipt, lease, mortgage receipt or utility bill. Homeless individuals are exempt from the verification requirement. Individuals are not required to reside in Wisconsin for any minimum period of time prior to receiving benefits.

Residents of an institution who receive most meals through the institution are ineligible for FoodShare. This does not apply to individuals who live in certain authorized facilities, such as shelters for the homeless, group living arrangements, or drug or alcohol treatment centers.

Child Support Payments. Under federal law, states may disqualify individuals who are delinquent in a court-ordered child support payment, or who do not cooperate in establishing paternity and obtaining support for the child. However, Wisconsin's program does not disqualify individuals from receiving FoodShare benefits for these reasons.

Criminal Violations. An individual cannot receive FoodShare benefits for any month in which he or she is a fugitive felon, or in violation of probation, parole, or extended court-ordered supervision.

Individuals convicted of a felony for possession, use, or distribution of a controlled substance within the last five years must pass a drug test to qualify for FoodShare. If the person fails the drug test, he or she is ineligible for 12 months. At the end of that 12-month period, the individual must submit to and pass a drug test to be eligible for FoodShare. Drug testing is not repeated when the person's eligibility is subsequently reviewed for recertification.

ABAWD Work Requirements. Federal law requires certain able-bodied adults without dependents (ABAWDs) to meet work requirements in order to remain eligible for FoodShare after exhausting three months of benefits in a 36-month period. Wisconsin waived this requirement from 2002 through 2013 under a state option offered by FNS. However, under provisions enacted in 2013 Wisconsin Act 20, DHS reinstituted the work requirement on July 1, 2014, for certain FoodShare recipients in Kenosha, Racine, and Walworth Counties, and plans to reinstitute the work requirement in all of the remaining counties on April 1, 2015.

An ABAWD is an individual, age 18 to 49, who is able to work, not pregnant, and does not reside in a household with a child under age 18.

Under the work requirement, ABAWDs must work or participate in a qualifying employment and training program for an average of 20 hours per week to remain eligible for FoodShare benefits. Qualifying programs include a FoodShare employment and training (FSET), Wisconsin Works (W-2), or Wisconsin Investment Act (WIA) program. ABAWDs who do not work or participate in these programs for an average of 20 hours per week or more can only receive FoodShare benefits for up to three months in a 36-month period (time-limited benefit).

Certain ABAWDs are exempt from work requirements and the time-limited benefit, including: (a) individuals who are determined unfit for employment, including individuals receiving temporary or permanent disability benefits from the government or a private source, are mentally or physically unable to work as determined by the IM agency, or are verified as unable to work by a statement from a health care professional or social worker; (b) individuals who are caring for a child under age six or an incapacitated person; (c) individuals receiving unemployment compensation (UC) or who have applied for, and are complying with, UC work requirements; (d) individuals regularly participating in an alcohol or other drug treatment or rehabilitation program; (e) students of higher education; and (f) individuals receiving transitional FoodShare benefits.

Transitional FoodShare Benefits. Households that previously received cash assistance under the Wisconsin Works (W-2) or tribal TANF benefits programs may qualify for FoodShare benefits for five months after the termination of these cash payments. A household's transitional FoodShare allotment is calculated using income, expenses, and household size from the month prior to the last W-2 or tribal TANF payment. Households may receive regular FoodShare benefits after the five-month transition period, but must apply for recertification for the program. In June, 2014, 19,100 FoodShare assistance groups (AGs), which are groups of financially eligible individu-

als who reside together, received transitional FoodShare benefits

Certification Periods. Most eligible households are certified to receive FoodShare benefits for a 12-month period. Households that include a migrant or seasonal farm worker and households that contain homeless individuals are certified for a six-month period. If all the members of a participating household are elderly, blind or disabled and no one in the household has earned income, the household must report changes in household size, earned and unearned income, and shelter expenses within 10 days of the change. All other households are "simplified reporting households," and thus are only required to report changes if their total monthly gross income exceeds 130% of the FPL.

Simplified reporting AGs are required to submit a six-month report form (SMRF), which identifies certain changes that may have occurred since the previous eligibility determination or redetermination that would affect program eligibility or benefits including: (a) a change of \$50 or more in unearned income based on the most recently verified amount; (b) changes in earned income, including wages, number of hours worked, and changes in jobs; and (c) changes in household composition, addresses, and legal obligations to pay child support.

Individuals may apply for FoodShare benefits and other health and human services in person at a local IM office, by phone, or online through the state's Access to Eligibility Support Services (ACCESS) website.

Benefits

Qualifying households are eligible to receive a monthly FoodShare benefit, which equals the maximum monthly benefit for a household minus 30% of that household's net adjusted income. This 30% represents the household's expected contribution to purchase food. The maximum monthly benefit varies by household size and is generally based on the cost of the USDA "thrifty food plan," a model market basket of foods intended to provide adequate nutrition at a low cost. The USDA periodically updates the food plan to reflect changes in nutrition recommendations, consumption, and food prices.

Table 2 shows the maximum monthly benefits available to participating households, by household size, effective October 1, 2014, through September 30, 2015. For households with one or two members, the minimum FoodShare benefit a household can receive is \$16. For households with more than two members, there is no minimum benefit amount.

Table 2: Maximum Monthly Benefit, by Household Size (Effective October, 2014 through September 30, 2015)

Household Size	Maximum Benefit
1	\$194
2	357
3	511
4	649
5	771
6	925
7	1,022
8	1.169

For each additional person, add \$146.

Determining Net Income. A household's benefit equals the maximum benefit in Table 2 minus 30% of net adjusted income. For Food-Share purposes, net adjusted income is calculated by subtracting the following credits from a household's gross monthly income. The dollar amounts in these calculations are in effect for the period October 1, 2014 through September 30, 2015.

Standard Credit. All households may deduct a standard credit from gross income, based on

household size. Households with one to three people receive a standard credit of \$155, households with four people receive a standard credit of \$165, households with five people receive a standard credit of \$193, and households with six or more people receive a standard credit of \$221.

Earned Income. Households receive a credit equal to 20% of earned income. Earned income includes salaries, wages, commissions, tips, or payments for services.

Medical Expenses. EBD recipients receive a medical expense credit equal to any out-of-pocket medical expenses that exceed \$35 per month. Examples of allowable medical expenses include medical and dental care, prescription or certain over-the-counter drugs, health insurance premiums, and certain home health care expenses.

Child Care. Individuals who pay for child care and who are employed or participate in work-related training or education may receive a child care credit. This credit cannot exceed actual child care expenses.

Child Support. Individuals required to make court-ordered child support payments receive a credit equal to the amount of the required payment. Individuals in households that receive legally-owed child support must include the child support as income.

Shelter Deduction and Utility Allowances. Households may deduct excess shelter and utility costs that exceed 50% of income after subtracting the other credits described above. Allowable shelter expenses include rent, mortgages, property taxes, mobile home lot rent and loan payments, insurance on the structure, special assessments, and condominium or condominium association fees, as well as "standard utility allowances" (SUAs) of specified amounts for heating, elec-

tricity, telephone, or other utilities.

Under provisions enacted as part of 2009 Wisconsin Act 28, any FoodShare participating household automatically received a federally-funded low-income home energy assistance program (LIHEAP) payment for heating assistance of no more than \$1. Prior to enactment of the federal Agricultural Act of 2014 (Agricultural Act), receipt of a LIHEAP payment of any amount qualified the household for the heating standard utility allowance (HSUA), the largest of the SUAs (\$446 in October, 2014). As a result of this legislation, all FoodShare recipients could claim the full HSUA as a deduction to their gross income.

The Agricultural Act stipulates that households must receive payment of greater than \$20 annually, so that households that receive the \$1 payment under 2009 Wisconsin Act 28 are no longer eligible for the HSUA. Households that no longer receive the LIHEAP payment may still be eligible for other utility allowances, such as limited utility, electric, cooking fuel, phone, water/sewer, or trash collection credits.

While approximately 255,760 households were issued the \$1 benefit in September, 2013, many of these recipients would still have qualified for the HSUA based on actual reported utility expenses. Therefore, it is unknown how many households lost eligibility for the HSUA following changes in the Agricultural Act.

A household may claim a maximum of \$490 in combined shelter and utility credits. There is no maximum for households that include an EBD member. In addition, homeless households may deduct actual expenses of shelter costs. Table 3 provides an example of how shelter and utility credits are calculated under the FoodShare program.

Table 3: Calculation of Shelter Deduction and Utility Allowances

A household may deduct any housing and utility expense greater than 50% of its income after prior deductions.

	Households		
	A	В	
1. Qualifying Shelter Expenses	\$600	\$700	
2. Utility Credits	450	300	
3. Income after Prior Deductions	1,000	1,800	
Total Credit (1 plus 2 minus 50% of 3)	\$490*	\$100	

^{*}Maximum Credit is \$490.

Benefit Determination Calculations. Table 4 provides three examples of monthly household benefit calculations. The examples show the monthly benefit for a three-member household with no monthly income (Household A), a three-member household with net income of \$1,000 per month (Household B), and a four-member household with net income of \$2,000 (Household C). In each case, 30% of household net adjusted income is subtracted from the maximum benefit amount for that household size to calculate the monthly benefit.

Table 4: Examples of Monthly Benefit Calculation

A household's monthly benefit equals the difference between the maximum benefit amount for the household size (Line 1) and 30% of net household income (Line 2).

	Households			
	A	В	C	
Household Size Net Monthly Household	3	3	4	
Income (after deductions)	\$0	\$1,000	\$2,000	
1. Maximum Monthly Benefit 2. 30% of Net Income	\$511 \$0	\$511 \$300	\$649 \$600	
Monthly Benefit (1 minus 2)	\$511	\$211	\$49	

FoodShare Purchases. Participating households can use FoodShare benefits to buy food or seeds and plants for home gardens to produce food. FoodShare benefits may not be spent on alcoholic beverages, tobacco, lunch counter items,

vitamins, medicines, pet foods, or any non-food items, and may not be exchanged for cash. Elderly, blind, and disabled recipients may use Food-Share benefits to purchase certain prepared meals. Sales tax is not added to FoodShare items.

The state issues debit cards, known as QUEST cards, to FoodShare participants. Recipients use the QUEST cards for purchases at participating retailers. Participants cannot use the QUEST card to receive cash from a participating food store, and each card requires the user to enter a four-digit personal identification number (PIN).

Each month, benefits automatically accrue in each household's account using an electronic benefits transfer (EBT) system. The household may use the QUEST card as often as it wishes during the month. Any unused balance in a given month is available in the following month; any unused benefits greater than 365 days old become unavailable after 365 days of QUEST card inactivity.

If a household's QUEST card is lost or stolen, federal regulations require a state to replace that card and to place a hold on the account. The replacement card is provided to the household at no charge. By state rule, a replacement card must be provided to the recipient within five business days after the agency is notified of a lost card.

The state contracts with Fidelity National Information Services (FIS) to provide services relating to the QUEST card, including a 24-hour customer and retailer service line. Recipients can use this line to report and replace lost, stolen, or damaged cards, obtain current account balances, obtain a transaction history, change the PIN, and resolve disputes regarding account transactions. If disputes are not resolved by FIS within 90 days, customer service refers the claim to state or county dispute resolution staff. The recipient can also request a hearing at any time. Lost benefits are generally replaced in the case of system malfunctions.

The Agricultural Act required all non-exempt

retailers to implement EBT systems immediately. Exempt retailers include farmers markets, direct marketing farmers, military commissaries, nonprofit food buying cooperatives, and certain group living arrangements. For this provision, the act also exempts those retailers currently utilizing manual vouchers until federal rules are promulgated regarding the change, but notes the intent of the USDA to largely eliminate manual vouchers except in cases of emergency. The act further requires non-exempt retailers to pay for EBT equipment and supplies, implementation, and related services by September 21, 2014. Retailers currently accepting manual vouchers as a means to conduct ongoing business are not exempt from this provision.

Administration

Although FoodShare benefits are fully funded by the federal government, state and local governments are responsible for administering the program. Many FoodShare administrative functions are combined with those for other public assistance programs, including the state's Medicaid program.

The FoodShare program is administered in all counties except Milwaukee by 10 multi-county IM consortia. These consortia manage call center functions, application processing and eligibility determinations, ongoing case management, and provide "lobby services" (such as responding to questions, providing information and facilitating access to interpreter services). The state-run IM office in Milwaukee County, Milwaukee Enrollment Services (MilES), is not included in a multicounty consortium. Instead, DHS staff performs case management functions for Milwaukee County residents.

In addition to the administration of MilES, the state has the following responsibilities in administering the IM system: (a) statewide IM training; (b) second-party reviews; (c) information technology for call centers; (d) eligibility database design and maintenance; (e) contract monitoring and other federal reporting; and (f) operation of the document processing unit. The state also previously operated an Enrollment Services Center (ESC) that enrolled childless adults. However, the responsibility of enrolling childless adults was transferred to the county consortia in 2012. FNS retains responsibility for certain administrative functions, including oversight of participating SNAP retailers.

The program is administered with a combination of federal, state and local funds. Federal matching funds generally support 50% of most eligible state and county administrative costs. In FFY 2012-13, the cost of FoodShare administrative functions totaled approximately \$47.2 million in state and local funds, and \$56.8 million in federal funds. These amounts include funding provided to support administration of the FSET program, described in the subsequent section.

FoodShare Employment and Training (FSET) Program

Federal law requires states to establish an employment and training program for SNAP participants. In Wisconsin, this program is the FSET program. Prior to 2008, non-disabled FoodShare recipients between the ages of 16 and 60 were generally required to participate in FSET. Provisions included in the 2007-09 biennial budget act made participation in the program voluntary, beginning in March, 2008.

Any adult FoodShare recipient may volunteer to participate in the FSET program, regardless of the participant's employment status, as long as the participant is capable of obtaining employment. However, participation in the FSET program can satisfy the new ABAWD work requirement authorized in 2013 Wisconsin Act 20. In anticipation of additional enrollment by ABAWDs due to the work requirement, 2013 Wisconsin Act 20 increased funding and positions for the program during the 2013-15 biennium.

Table 5 shows participation in FSET in July, 2009 through May, 2014. DHS anticipates growth in participation among non-exempt ABAWDs in the 2015-17 biennium due to the work requirements. The department estimates FSET participation among non-exempt ABAWDs will reach 11,300 in FY 2014-15, 33,500 in FY 2015-16, and 38,800 in FY 2016-17. This participation is in addition to continued voluntary FSET participation, which averaged approximately 5,400 per year from 2009 through 2013, a level that DHS expects to continue.

Table 5: FSET Participation

	FSET Participants
2009	5,285
2010	5,035
2011	5,812
2012	5,756
2013	5,292
2014	5,120*

*Participation as of July of each year, except 2014; 2014 figure is as of May.

Effective April 1, 2015, FSET will be administered regionally by a sole vendor for each region. Regional vendors may subcontract for FSET services. FSET agencies must offer orientation, ongoing assessment, and employment search support. Additional services may include basic education, short-term vocational training, workfare, and supportive services including transportation or other work and job interview-related expenses (such as child care, clothing suitable for job interviews, vision correction, or dental work). FSET agencies may also assist participants in becoming self-employed.

After the FSET agency conducts an assessment of a participating individual, the agency develops an initial employment plan within the first three weeks after enrollment. The agency determines appropriate activities and services that the participant may choose to accept. The individual and case worker then develop a written agreement that is reviewed and updated at least every three months while an ABAWD participates in FSET, and every six months for voluntary participants. In order to maintain eligibility for FSET-funded support services, individuals must fulfill work, employment search, or training requirements established in their employment plan.

FSET is funded through two sources, in addition to any local funds that are matched with federal funds: (a) a 100% federal allocation; and (b) a GPR allocation matched with federal dollars. The 100% federal allocation funds activities to enable individuals to obtain unsubsidized employment. Agencies may use these funds to support expenses related to the development, administration, and contracting for allowable case management expenses for participating individuals. FSET agencies may use the GPR allocation to support administrative expenses that exceed the 100% federal allocation, and for supportive services to participating individuals for reasonable and necessary expenses that directly relate to participation in FSET. FNS also provides a 50 percent reimbursement of administrative expenses and participant costs. Appendix III provides the all-funds maximum FSET allocations for calendar year 2013, by county and tribe.

Sanctions and Penalties

Federal penalties may be assessed to SNAP recipients and retailers for intentional violations of program policies. States may also be liable for penalties for errors in determining the payment amounts to recipients.

Violations by Recipients. The state is responsible for ensuring that recipients comply with SNAP regulations. FoodShare participants are subject to penalties for intentional program violations (IPVs). In 2012, 201 FoodShare recipients were sanctioned for IPVs, and in 2013, 529 FoodShare recipients were sanctioned for IPVs.

Violations include making a false or misleading statement, misrepresenting, concealing, or withholding facts, or committing any violation of federal or state law or regulations in order to use, transfer, receive, or traffic FoodShare benefits. Benefit trafficking is generally defined as exchanging SNAP benefits for cash rather than allowable food items.

The state may bar a person who commits an IPV from the program for a certain period of time, depending on the severity of the violation and the number of previous violations. Individuals are ineligible for benefits for one year after the first IPV and for two years after a second IPV or after an IPV involving the sale of drugs. A state or federal court may disqualify for 10 years a person who makes a fraudulent statement about his or her identity or residence to simultaneously receive multiple benefits.

An individual is permanently barred from the program if he or she commits any of the following: (a) a third IPV; (b) a first IPV where benefits are involved in the sale of firearms, ammunition, or explosives; (c) a first IPV involving the trafficking of \$500 or more of program benefits; or (d) a second IPV where benefits are involved in the sale of drugs.

A violation may be determined by a variety of means, including a court order or an administrative disqualification hearing. An individual remains eligible for FoodShare during a pending hearing or court proceeding. If a person is found to have committed an IPV, the penalty applies only to that individual, and not to other members of the household.

Violations by Retailers. FNS monitors retailer compliance with SNAP regulations, and makes authorization and disqualification decisions. Retailer violations include sale of ineligible items, benefit trafficking, or accepting benefits without authorization. Penalties range from a six-month disqualification to permanent disqualification from program participation, depending on the type of violation and the number of previous violations. In FFY 2012-13, the USDA temporarily disqualified 10 retailers, and permanently disqualified 11 retailers in Wisconsin.

In January, 2012, DHS sought broader authority from the USDA to monitor FoodShare retailer activities in Wisconsin. The USDA responded by encouraging DHS to work through existing options for state involvement in retailer fraud investigation, specifically through a state law enforcement bureau agreement.

State Payment Accuracy. The USDA may sanction state governments for incorrectly providing or denying SNAP benefits, or may make bonus payments to states for high payment accuracy.

If a state's payment error rate exceeds 105% of the national average payment error rate for two consecutive years, that state is liable for a financial penalty. The USDA imposes no sanctions on any state with an actual payment error rate of less than 6%, regardless of how that state's error rate compares to the national average. While FNS was previously able to waive the penalty, allow the state to invest a portion of the penalty to improve program administration, or require the state to pay a portion of the penalty to the federal government, the Agricultural Act disallows FNS from waiving any portion of a penalty imposed due to excessive error rates in two consecutive FFYs.

The USDA sanctioned Wisconsin for Food-Share payment error every year from FFY 1993-94 to FFY 2001-02. DHS was permitted to use

the penalty amounts to improve program administration. Wisconsin's error rate has since decreased, and has fallen within the acceptable range in every year except 2007-08. The state avoided sanctions for that year by improving its payment error rate in 2008-09 through analysis of program policies and a case review by a private contractor. As a result of this improvement, Wisconsin received \$2.1 million in federal performance bonus awards in FFY 2010-11 and \$1.8 million in FFY 2011-12. These bonuses were used to support IM consortia and FoodShare administrative costs. The Agricultural Act requires bonuses to be used for FoodShare administration, fraud reduction, or improvement.

The Agricultural Act requires the state to submit an annual report to the USDA verifying that it did not issue FoodShare benefits to disqualified or deceased individuals. The USDA may financially penalize states that do not submit this report. However, states are not required to comply with this requirement until after the federal rulemaking process occurs, the timeline for which has yet to be determined.

Legislative Audit Bureau FoodShare Audit

In April, 2012, the Legislative Audit Bureau (LAB), a non-partisan legislative service agency that assists the Legislature in overseeing and monitoring state programs, released an audit of

the FoodShare program. The report reviewed a variety of issues, including benefit and administrative expenditures, eligibility and benefit determination accuracy and timeliness, and provision of benefits to ineligible individuals.

The LAB made multiple recommendations for program improvement, and requested that DHS respond to the Joint Audit Committee on certain issues. These issues included: (a) plans to verify FoodShare applicant social security numbers; (b) results of DHS efforts to improve the timeliness of benefit determinations; (c) plans to review and address cases where multiple replacement cards may indicate unallowable use; (d) plans to provide additional training to caseworkers; (e) plans to implement an effective process to prevent incarcerated individuals and individuals fleeing prosecution or incarceration from receiving FoodShare benefits, and recover any inappropriately provided benefits; (f) improvements to staff training for IPV disqualification procedures; and (g) a description of how the Department will conduct future fraud prevention activities.

DHS submitted a report to the Joint Audit Committee on December 3, 2012, that addressed the recommendations in the FoodShare audit. DHS has continued to implement initiatives in response to the audit, including sending letters to individuals who request multiple replacement cards and conducting investigations prior to replacing cards for individuals requesting more than four cards in a 12-month period.

Additional Resources

Additional information on FoodShare can be found through the following resources:

Wisconsin Department of Health Services www.dhs.wisconsin.gov/foodshare

FoodShare Wisconsin Handbook www.emhandbooks.wi.gov/fsh

FSET Handbook www.emhandbooks.wi.gov/fset

U.S. Food and Nutrition Services, U.S. Department of Agriculture www.fns.usda.gov/snap

Legislative Audit Bureau 2012 Audit Report and DHS Follow-up Letter legis.wisconsin.gov/lab/reports/12-8full.pdf legis.wisconsin.gov/lab/reports/follow-up/FoodShare_DHS_12-8.pdf

APPENDIX I

Average Monthly Number of Recipients, By County and Tribe
Calendar Years 2009 through 2013

County/Tribe	2009	2010	2011	2012	2013
State Total	595,025	743,836	816,215	840,193	856,177
Adams	2,872	3,229	3,358	3,875	3,928
Ashland	2,747	3,046	3,102	3,339	3,204
Barron	5,625	6,467	7,032	7,435	7,386
Bayfield	1,083	1,250	1,384	1,594	1,556
Brown	22,027	25,526	27,561	30,534	30,658
Buffalo	1,105	1,385	1,454	1,429	1,388
Burnett	2,093	2,380	2,331	2,671	2,639
Calumet	2,345	2,721	2,839	3,111	3,111
Chippewa	6,635	7,610	7,956	8,326	8,012
Clark	2,428	2,964	3,228	3,675	3,855
Columbia	4,121	4,950	5,344	6,288	6,180
Crawford	1,690	1,862	1,897	2,229	2,247
Dane	34,204	39,070	42,470	52,199	52,962
Dodge	6,245	7,467	7,892	8,823	9,417
Door	1,716	2,097	2,347	2,771	2,714
Douglas	5,756	6,386	6,848	7,695	7,432
Dunn	4,446	5,030	5,214	5,648	5,395
Eau Claire	9,558	10,839	11,746	13,641	13,472
Florence	508	585	595	644	616
Fond du Lac	7,485	8,635	9,234	10,499	10,831
Forest	981	1,276	1,453	1,512	1,473
Grant	3,490	4,095	4,288	4,886	5,169
Green	3,012	3,596	3,836	4,265	4,401
Green Lake	1,506	1,801	1,931	2,181	2,312
Iowa	1,925	2,282	2,375	2,607	2,520
Iron	657	837	851	959	958
Jackson	1,953	2,256	2,334	2,602	2,700
Jefferson	5,590	7,214	7,954	9,025	9,467
Juneau	2,689	3,259	3,603	4,379	4,373
Kenosha	21,818	24,124	25,583	29,086	30,188
Kewaunee	1,252	1,633	1,742	1,836	1,819
La Crosse	10,124	11,421	12,007	13,481	13,531
Lafayette	1,190	1,511	1,700	1,897	1,935
Langlade	3,008	3,272	3,506	4,008	3,985
Lincoln	2,829	3,428	3,699	4,072	3,984
Manitowoc	5,838	7,006	7,303	8,421	8,646
Marathon	11,799	14,105	14,881	17,084	17,333
Marinette	4,674	5,292	5,514	6,106	6,142
Marquette	1,610	1,813	1,978	2,264	2,295
Milwaukee	186,382	210,370	226,394	279,241	287,803

County/Tribe	2009	2010	2011	2012	2013
Monroe	4,183	5,047	5,442	6,111	6,302
Oconto	3,273	3,635	3,791	4,315	4,272
Oneida	3,429	4,152	4,440	4,951	4,758
Outagamie	10,769	12,719	13,564	15,977	16,421
Ozaukee	2,901	3,508	3,738	4,169	4,223
Ozdukee	2,701	3,300	3,730	4,107	7,223
Pepin	602	703	710	726	732
Pierce	2,008	2,519	2,743	2,898	2,854
Polk	3,756	4,722	4,999	5,339	5,254
Portage	5,271	5,980	6,247	7,238	7,221
Price	1,624	1,802	1,873	2,048	2,009
Racine	25,177	27,574	28,698	33,820	35,272
Richland	2,039	2,476	2,619	2,746	2,921
Rock	21,699	24,646	26,151	30,481	30,945
Rusk	2,286	2,588	2,717	2,802	2,727
St.Croix	4,241	5,387	5,754	5,880	5,705
St. Cloix	7,271	5,567	3,734	3,000	3,703
Sauk	5,117	6,328	6,940	7,870	8,325
Sawyer	2,709	3,102	3,305	3,536	3,354
Shawano	3,507	4,323	4,636	5,344	5,375
Sheboygan	10,189	11,762	12,467	14,293	14,373
Taylor	2,004	2,369	2,479	2,636	2,533
Trempealeau	2,434	2,789	2,975	3,040	3,030
Vernon	2,403	2,838	3,023	3,379	3,515
Vilas	1,635	1,827	1,933	2,316	2,291
Walworth	8,560	10,456	11,617	12,914	12,944
Washburn	2,141	2,552	2,833	3,012	2,841
vv dollo dilli	2,171	2,332	2,033	3,012	2,041
Washington	6,594	7,969	8,333	9,376	9,258
Waukesha	10,893	13,936	16,002	19,312	19,994
Waupaca	4,114	4,954	5,132	5,942	6,081
Waushara	2,481	2,880	2,930	3,289	3,268
Winnebago	12,677	14,695	15,703	18,780	19,547
Wood	8,043	9,192	9,853	11,362	11,834
Menominee	1,531	1,823	1,951	2,051	2,112
Enrollment Services*	22,470	73,238	98,292	126	631
Red Cliff	510	583	625	641	204
Stockbridge-Munsee	181	222	250	262	57
Potawatomi	52	60	44	45	1,528
Lac du Flambeau	1,126	1,333	1,440	1,530	566
Bad River	556	501	501	568	274
Sokaogon Tribe	193	221	246	265	2,548
Oneida Nation	1,991	2,333	2,456	2,467	43

^{*}The Enrollment Services Center began handling all FoodShare applications for childless adults in June 15, 2009, regardless of the individual's county of residence. The 2011-13 biennial budget eliminated the direct case management functions of the ESC, and counties assumed responsibility for those enrollees beginning in 2012.

APPENDIX II

FoodShare Benefits Payments, By County and Tribe
Calendar Years 2009 through 2013

County/Tribe	2009	2010	2011	2012	2013
State Total	\$778,928,757	\$1,039,285,561	\$1,142,135,382	\$1,177,814,176	\$1,188,988,277
Adams	\$3,384,613	\$4,030,832	\$4,226,058	\$4,934,463	\$4,770,176
Ashland	3,200,141	3,663,912	3,714,598	4,204,857	4,003,424
Barron	6,505,454	7,953,795	8,716,058	9,381,587	9,167,333
Bayfield	1,251,462	1,479,241	1,651,291	2,042,595	2,014,673
Brown	27,916,720	33,464,802	36,271,685	41,140,366	40,654,088
Buffalo	1,152,257	1,584,503	1,720,436	1,667,095	1,584,455
Burnett	2,512,968	2,921,459	2,815,083	3,317,209	3,165,652
Calumet	2,551,099	3,019,035	3,139,236	3,640,406	3,542,451
Chippewa	7,434,347	8,817,763	9,418,411	10,139,731	9,807,026
Clark	2,703,833	3,370,906	3,651,373	4,429,559	4,555,881
Columbia	4,946,775	6,059,584	6,678,552	8,231,479	7,876,025
Crawford	1,782,536	2,087,861	2,142,191	2,576,461	2,568,502
Dane	45,995,151	53,593,445	57,794,718	74,820,015	75,166,382
Dodge	7,338,637	9,080,291	9,640,883	11,118,987	11,895,484
Door	1,873,935	2,445,992	2,840,485	3,484,947	3,387,818
Douglas	7,427,017	8,534,956	9,010,395	10,515,375	9,983,353
Dunn	5,062,070	5,958,303	6,226,474	7,035,835	6,741,244
Eau Claire	11,342,399	13,303,934	14,533,156	17,892,586	17,684,264
Florence	560,156	663,429	712,974	810,387	802,518
Fond du Lac	9,088,270	10,895,402	11,586,238	13,829,986	14,055,013
Forest	1,202,410	1,644,003	1,923,802	2,002,512	1,914,015
Grant	3,643,424	4,633,276	4,904,102	5,862,923	6,067,055
Green	3,351,157	4,296,394	4,548,160	5,198,375	5,291,539
Green Lake	1,609,848	2,097,164	2,220,682	2,611,590	2,808,703
Iowa	2,132,564	2,685,812	2,789,958	3,156,432	3,002,667
Iron	704,688	924,577	977,136	1,167,478	1,171,424
Jackson	2,310,100	2,769,205	2,810,878	3,282,749	3,399,692
Jefferson	6,766,950	9,046,189	9,952,491	11,534,783	11,961,155
Juneau	3,009,435	3,838,314	4,202,039	5,339,069	5,293,469
Kenosha	29,409,978	33,458,954	35,351,022	42,358,064	43,323,078
Kewaunee	1,424,975	1,927,985	2,111,352	2,301,582	2,200,681
La Crosse	12,188,517	14,332,028	15,057,490	17,839,876	17,770,045
Lafayette	1,323,292	1,751,515	1,921,826	2,255,830	2,220,791
Langlade	3,541,246	4,034,498	4,370,937	5,143,297	5,114,233
Lincoln	3,200,105	4,094,932	4,487,965	5,131,547	4,984,189
Manitowoc	6,474,934	8,217,792	8,673,521	10,620,657	10,670,693
Marathon	14,169,026	17,504,064	18,570,977	22,103,649	22,099,475
Marinette	5,415,125	6,434,934	6,489,498	7,443,573	7,523,796
	5,415,125 1,882,456	2,223,194	2,393,443	2,846,373	2,908,711
Marquette Milwaukee	263,992,484	320,558,172	2,393,443	433,639,570	443,033,883
wiiiwaukee	203,392,464	320,338,172	334,332,213	455,059,570	445,055,885

County/Tribe	2009	2010	2011	2012	2013
Monroe	\$4,912,333	\$6,242,636	\$7,000,580	\$8,033,629	\$8,116,890
Oconto	3,956,856	4,587,280	4,825,273	5,584,351	5,372,951
Oneida	3,893,788	5,149,998	5,473,733	6,284,641	5,918,885
Outagamie	13,136,939	15,874,999	16,584,444	20,163,981	20,525,301
Ozaukee	3,429,740	4,277,506	4,639,700	5,347,133	5,306,948
	, ,				
Pepin	654,903	760,010	740,408	779,769	841,993
Pierce	2,411,750	3,126,052	3,404,099	3,676,739	3,654,721
Polk	4,324,520	5,739,113	6,083,252	6,656,057	6,519,134
Portage	6,076,869	7,193,406	7,502,417	9,213,343	9,155,136
Price	1,702,203	1,981,299	2,132,290	2,448,467	2,340,464
Racine	34,281,552	38,036,574	39,432,940	48,726,833	50,509,731
Richland	2,414,131	3,061,782	3,269,434	3,497,738	3,667,165
Rock	28,858,260	34,202,759	36,207,351	43,742,684	43,814,678
Rusk	2,545,084	3,057,661	3,166,139	3,323,963	3,176,782
St.Croix	5,205,806	6,801,835	7,100,811	7,357,895	6,988,064
bt.Cloix	3,203,000	0,001,033	7,100,011	7,557,075	0,700,004
Sauk	6,127,980	7,918,230	8,665,740	10,205,358	10,654,317
Sawyer	3,406,619	4,022,709	4,285,106	4,730,966	4,452,275
Shawano	4,186,105	5,338,150	5,666,577	6,751,748	6,751,746
Sheboygan	12,010,256	14,611,927	15,864,324	18,979,005	18,895,269
Taylor	2,100,581	2,628,713	2,779,520	3,026,170	2,892,824
Trempealeau	2,636,553	3,264,918	3,495,352	3,764,693	3,687,197
Vernon	2,701,576	3,309,861	3,468,732	4,127,515	4,159,371
Vilas	1,838,102	2,121,090	2,233,426	2,822,930	2,791,367
Walworth	10,932,380	13,639,706	15,329,647	17,690,123	17,470,856
Washburn	2,599,854	3,106,671	3,460,090	3,762,127	3,461,942
vv abilo aiii	2,377,031	3,100,071	2,100,070	3,702,127	3,101,512
Washington	7,898,337	9,647,719	10,104,376	12,011,378	11,768,194
Waukesha	13,433,652	17,501,354	20,070,116	25,668,160	26,204,520
Waupaca	4,716,114	5,975,858	6,191,641	7,586,359	7,652,068
Waushara	2,834,352	3,384,093	3,417,873	3,987,525	3,868,080
Winnebago	15,404,965	18,550,490	19,803,185	24,788,705	25,458,315
Wood	9,495,115	11,242,794	12,074,056	14,529,914	15,197,039
Menominee	2,212,827	2,770,241	2,941,160	3,193,804	3,335,041
TVICTION THINCE	2,212,027	2,770,211	2,5 11,100	3,173,001	3,333,011
Enrollment Services*	28,402,778	133,376,334	182,297,336	185,442	860,214
Red Cliff	701,495	812,145	875,574	897,292	241,021
Stockbridge-Munsee	228,521	291,248	328,115	324,570	67,516
Potawatomi	62,361	76,103	58,279	56,449	2,412,800
Lac du Flambeau	1,664,997	2,017,974	2,282,833	2,441,546	769,579
Bad River	753,665	645,804	659,694	766,262	393,984
Sokaogon Tribe	247,695	304,664	326,470	347,474	3,390,092
Oneida Nation	2,744,588	3,231,406	3,313,500	3,277,583	58,751

^{*}The Enrollment Services Center began handling all FoodShare applications for childless adults in June 15, 2009, regardless of the individual's county of residence. The 2011-13 biennial budget eliminated the direct case management functions of the ESC, and counties assumed responsibility for those enrollees beginning in 2012.

APPENDIX III

FSET Maximum Allocations (State, Federal, and Local Funds) Calendar Year 2013

Statewide Total \$13,044,425 Adams 35,939 Milwaukee 4,396,739 Ashland 39,909 Monroe 17,521 Barron 101,729 Ocototo 201,670 Bayfield 6,785 Oncida 19,172 Brown 154,037 Outagamie 187,155 Buffalo 5,166 Ozaukee 30,916 Burnett 8,900 Pepin 6,945 Calumet 27,342 Pierce 12,465 Clark 19,326 Portage 100,106 Columbia 28,721 Price 12,645 Crawford 7,051 Racine 435,016 Dane 1,352,782 Richland 14,031 Dodge 44,908 Rock 117,787 Dor 56,796 Rusk 17,502 Douglas 32,301 St. Croix 22,133 Dunn 70,759 Sauk 45,317 Eur Claire 143,354 Sawyer 13,06	County/Tribe	Amount	County/Tribe	Amount
Ashland 39,909 Monroe 17,521 Barron 101,729 Oconto 201,670 Bayfield 6,785 Oneida 19,172 Brown 154,037 Outagamie 187,155 Buffalo 5,166 Ozaukee 30,916 Burnett 8,900 Pepin 6,945 Calumet 27,342 Pierce 12,463 Chippewa 134,669 Polk 21,337 Clark 19,326 Portage 100,106 Columbia 28,721 Price 12,645 Crawford 7,051 Racine 435,016 Dane 1,352,782 Richland 14,031 Dodge 44,908 Rock 117,787 Door 56,796 Rusk 17,502 Douglas 32,301 St. Croix 22,133 Dunn 70,759 Sauk 45,317 Eu Claire 143,354 Sawyer 13,016 Florence 2,519 Shawa	Statewide Total	\$13,044,425		
Ashland 39,909 Monroe 17,521 Barron 101,729 Oconto 201,670 Bayfield 6,785 Oneida 19,172 Brown 154,037 Outagamie 187,155 Buffalo 5,166 Ozaukee 30,916 Burnett 8,900 Pepin 6,945 Calumet 27,342 Pierce 12,463 Chippewa 134,669 Polk 21,337 Clark 19,326 Portage 100,106 Columbia 28,721 Price 12,645 Crawford 7,051 Racine 435,016 Dane 1,352,782 Richland 14,031 Dodge 44,908 Rock 117,787 Door 56,796 Rusk 17,502 Douglas 32,301 St. Croix 22,133 Dunn 70,759 Sauk 45,317 Eu Claire 143,354 Sawyer 13,016 Florence 2,519 Shawa	Adams	35,939	Milwaukee	4,396,739
Barron 101,729 Oconto 201,670 Bayfield 6,785 Oneida 19,172 Brown 154,037 Outagamie 187,155 Buffalo 5,166 Ozaukee 30,916 Burnett 8,900 Pepin 6,945 Calumet 27,342 Pierce 12,463 Chippewa 134,669 Polk 21,337 Clark 19,326 Portage 100,106 Columbia 28,721 Price 12,645 Crawford 7,051 Racine 435,016 Dane 1,352,782 Richland 14,031 Dodge 44,908 Rock 117,787 Door 56,796 Rusk 17,502 Douglas 32,301 St. Croix 22,133 Dunn 70,759 Sauk 45,317 Eau Claire 143,354 Sawyer 13,016 Florest 6,797 Taylor 10,979 Grant 21,163 Trempea				
Bayfield Brown 6,785 Drown Oneida Outagamie 19,172 Drown Burfalo 5,166 Drown Ozaukee 30,916 Drown Burnett 8,900 Pepin 6,945 Drown 6,945 Drown Calumet 27,342 Pierce 12,645 Drown 12,337 Drown Clark 19,326 Portage 100,106 Drown 21,337 Drown Columbia 28,721 Price 12,645 Drown 12,645 Drown Crawford 7,051 Racine 435,016 Drown 435,016 Drown Dane 1,352,782 Richland 14,031 Drown 14,031 Drown 14,031 Drown Dougles 44,908 Rock 117,787 Drown 17,502 Drown 15,002 Drown 22,133 Drown 17,502 Drown 22,133 Drown 15,002 Drown 13,016 Drown 45,317 Drown 15,311 Drown 15,332 Drown 15,331 Drown 15,337 Drown 15,337 Drown 15,337 Drown 15,337 Drown 15,337 Drown <td></td> <td></td> <td></td> <td></td>				
Brown 154,037 Outagamie 187,155 Burfalo 5,166 Ozaukee 30,916 Burnett 8,900 Pepin 6,945 Calumet 27,342 Pierce 12,645 Chippewa 134,669 Polk 21,337 Clark 19,326 Portage 100,106 Columbia 28,721 Price 12,645 Crawford 7,051 Racine 435,016 Dane 1,352,782 Richland 14,031 Dodge 44,908 Rock 117,787 Door 56,796 Rusk 17,502 Douglas 32,301 St. Croix 22,133 Dumn 70,759 Sauk 45,317 Eau Claire 143,354 Sawyer 13,016 Florence 2,519 Shawano 15,311 Forest 6,797 Taylor 10,979 Grant 21,163 Trempealeau 13,392 Green 25,552 Verno				
Buffalo 5,166 Ozaukee 30,916 Burnett 8,900 Pepin 6,945 Calumet 27,342 Pierce 12,463 Chippewa 134,669 Polk 21,337 Clark 19,326 Portage 100,106 Columbia 28,721 Price 12,645 Crawford 7,051 Racine 435,016 Dane 1,352,782 Richland 14,031 Dodge 44,908 Rock 117,787 Door 56,796 Rusk 17,502 Douglas 32,301 St. Croix 22,133 Dunn 70,759 Sauk 45,317 Eau Claire 143,354 Sawyer 13,016 Florence 2,519 Shawano 15,311 Fond du Lac 51,582 Sheboygan 138,733 Forest 6,797 Taylor 10,979 Grant 21,163 Trempealeau 13,392 Green 25,5552 Vernon 10,180 Green 25,5552 Vernon 10,180 Green 25,5552 Vernon 10,180 Green 10,606 Washburn 8,901 Jackson 10,674 Washorth 61,379 Iron 6,606 Washburn 8,901 Jackson 10,674 Washorth 61,379 Iron 6,606 Washburn 8,901 Jackson 10,674 Washorth 61,379 Kewaunee 9,199 Winnebago 197,184 La Crosse 170,773 Wood 1,416,565 Lafayette 5,085 Lafayette 5,085 Lafayette 5,085 Langlade 17,498 Bad River 15,098 Lincoln 17,430 Lac du Flambeau 24,675 Oneida Nation 7,282 Manitowoc 49,976 Potawatomi 5,074 Marathon 190,455 Red Cliff 11,990 Marinette 46,034 Sokogon 15,530 Marquette 14,401 Stockbridge-Munsee 5,299	-			
Burnett 8,900 Pepin 6,945 Calumet 27,342 Pierce 12,463 Chippewa 134,669 Polk 21,337 Clark 19,326 Portage 100,106 Columbia 28,721 Price 12,645 Crawford 7,051 Racine 435,016 Dane 1,352,782 Richland 14,031 Dodge 44,908 Rock 117,787 Door 56,796 Rusk 17,502 Douglas 32,301 St. Croix 22,133 Dunn 70,759 Sauk 45,317 Eau Claire 143,354 Sawyer 13,016 Florence 2,519 Shawano 15,311 Ford du Lac 51,582 Sheboygan 138,733 Forest 6,797 Taylor 10,979 Grant 21,163 Trempealeau 13,392 Green 25,552 Vermon 10,180 Green Lake 27,703 <	210 (/11	10 1,007	Guugumio	107,100
Calumet 27,342 Pierce 12,463 Chippewa 134,669 Polk 21,337 Clark 19,326 Portage 100,106 Columbia 28,721 Price 12,645 Crawford 7,051 Racine 435,016 Dane 1,352,782 Richland 14,031 Dodge 44,908 Rock 117,787 Door 56,796 Rusk 17,502 Douglas 32,301 St. Croix 22,133 Dunn 70,759 Sauk 45,317 Eau Claire 143,354 Sawyer 13,016 Florence 2,519 Shawano 15,311 Ford du Lac 51,582 Sheboygan 138,733 Forest 6,797 Taylor 10,979 Grant 21,163 Trempealeau 13,392 Green Lake 27,703 Vilas 7,659 Iowa 8,434 Walworth 61,379 Iron 6,606	Buffalo	5,166	Ozaukee	30,916
Chippewa 134,669 Polk 21,337 Clark 19,326 Portage 100,106 Columbia 28,721 Price 12,645 Crawford 7,051 Racine 435,016 Dane 1,352,782 Richland 14,031 Dodge 44,908 Rock 117,787 Door 56,796 Rusk 17,502 Douglas 32,301 St. Croix 22,133 Dunn 70,759 Sauk 45,317 Eau Claire 143,354 Sawyer 13,016 Floresce 2,519 Shawano 15,311 Fond du Lac 51,582 Sheboygan 138,733 Forest 6,797 Taylor 10,979 Grant 21,163 Trempealeau 13,392 Green 25,552 Vernon 10,180 Green Lake 27,703 Vilas 7,659 Iowa 8,434 Walworth 61,379 Jefferson 40,547	Burnett	8,900	Pepin	6,945
Clark 19,326 Portage 100,106 Columbia 28,721 Price 12,645 Crawford 7,051 Racine 435,016 Dane 1,352,782 Richland 14,031 Dodge 44,908 Rock 117,787 Door 56,796 Rusk 17,502 Douglas 32,301 St. Croix 22,133 Dunn 70,759 Sauk 45,317 Eau Claire 143,354 Sawyer 13,016 Florence 2,519 Shawano 15,316 Florence 2,519 Shawano 138,733 Forest 6,797 Taylor 10,979 Grant 21,163 Trempealeau 13,392 Green 25,552 Vernon 10,180 Green Lake 27,703 Vilas 7,659 Iowa 8,434 Walworth 61,379 Iron 6,606 Washburn 8,901 Jackson 10,674 Washing	Calumet	27,342	Pierce	12,463
Clark 19,326 Portage 100,106 Columbia 28,721 Price 12,645 Crawford 7,051 Racine 435,016 Dane 1,352,782 Richland 14,031 Dodge 44,908 Rock 117,787 Door 56,796 Rusk 17,502 Douglas 32,301 St. Croix 22,133 Dunn 70,759 Sauk 45,317 Eau Claire 143,354 Sawyer 13,016 Florence 2,519 Shawano 15,311 Fond du Lac 51,582 Sheboygan 138,733 Forest 6,797 Taylor 10,979 Grant 21,163 Trempealeau 13,392 Green 25,552 Vernon 10,180 Green Lake 27,703 Vilas 7,659 Iowa 8,434 Walworth 61,379 Iron 6,606 Washburn 8,901 Jackson 10,674 W	Chippewa	134,669	Polk	21,337
Crawford 7,051 Racine 435,016 Dane 1,352,782 Richland 14,031 Dodge 44,908 Rock 117,787 Door 56,796 Rusk 17,502 Douglas 32,301 St. Croix 22,133 Dunn 70,759 Sauk 45,317 Eau Claire 143,354 Sawyer 13,016 Florence 2,519 Shawano 15,311 Fond du Lac 51,582 Sheboygan 138,733 Forest 6,797 Taylor 10,979 Grant 21,163 Trempealeau 13,392 Green 25,552 Vernon 10,180 Green Lake 27,703 Vilas 7,659 Iowa 8,434 Walworth 61,379 Iron 6,606 Washburn 8,901 Jackson 10,674 Washburn 8,901 Jackson 10,674 Waukesha 193,562 Juneau 13,679 <t< td=""><td></td><td>19,326</td><td>Portage</td><td>100,106</td></t<>		19,326	Portage	100,106
Crawford 7,051 Racine 435,016 Dane 1,352,782 Richland 14,031 Dodge 44,908 Rock 117,787 Door 56,796 Rusk 17,502 Douglas 32,301 St. Croix 22,133 Dunn 70,759 Sauk 45,317 Eau Claire 143,354 Sawyer 13,016 Florence 2,519 Shawano 15,311 Fond du Lac 51,582 Sheboygan 138,733 Forest 6,797 Taylor 10,979 Grant 21,163 Trempealeau 13,392 Green 25,552 Vernon 10,180 Green Lake 27,703 Vilas 7,659 Iowa 8,434 Walworth 61,379 Iron 6,606 Washburn 8,901 Jackson 10,674 Washburn 8,901 Jackson 10,674 Waukesha 193,562 Juneau 13,679 <t< td=""><td></td><td></td><td></td><td></td></t<>				
Dane 1,352,782 Richland 14,031 Dodge 44,908 Rock 117,787 Door 56,796 Rusk 17,502 Douglas 32,301 St. Croix 22,133 Dunn 70,759 Sauk 45,317 Eau Claire 143,354 Sawyer 13,016 Florence 2,519 Shawano 15,311 Fond du Lac 51,582 Sheboygan 138,733 Forest 6,797 Taylor 10,979 Grant 21,163 Trempealeau 13,392 Green 25,552 Vernon 10,180 Green Lake 27,703 Vilas 7,659 Iowa 8,434 Walworth 61,379 Iron 6,606 Washburn 8,901 Jackson 10,674 Washington 50,922 Jefferson 40,547 Waukesha 193,562 Juneau 13,679 Waupaca 27,127 Kenosha 1,057,148			Price	
Dodge 44,908 Rock 117,787 Door 56,796 Rusk 17,502 Douglas 32,301 St. Croix 22,133 Dunn 70,759 Sauk 45,317 Eau Claire 143,354 Sawyer 13,016 Florence 2,519 Shawano 15,311 Fond du Lac 51,582 Sheboygan 138,733 Forest 6,797 Taylor 10,979 Grant 21,163 Trempealeau 13,392 Green 25,552 Vernon 10,180 Green Lake 27,703 Vilas 7,659 Iowa 8,434 Walworth 61,379 Iron 6,606 Washburn 8,901 Jackson 10,674 Washburn 8,901 Jackson 10,674 Washburn 8,901 Jackson 40,547 Waukesha 193,562 Juneau 13,679 Waupaca 27,127 Kenosha 1,957,148	Crawford	7,051		435,016
Door 56,796 Rusk 17,502 Douglas 32,301 St. Croix 22,133 Dunn 70,759 Sauk 45,317 Eau Claire 143,354 Sawyer 13,016 Florence 2,519 Shawano 15,311 Fond du Lac 51,582 Sheboygan 138,733 Forest 6,797 Taylor 10,979 Grant 21,163 Trempealeau 13,392 Green 25,552 Vernon 10,180 Green Lake 27,703 Vilas 7,659 Iwa 8,434 Walworth 61,379 Iron 6,606 Washburn 8,901 Jackson 10,674 Washington 50,922 Jefferson 40,547 Waukesha 193,562 Juneau 13,679 Waupaca 27,127 Kenosha 1,057,148 Waushara 16,006 Kewaunee 9,199 Winnebago 197,184 La Crosse 170,77	Dane	1,352,782	Richland	14,031
Douglas 32,301 St. Croix 22,133 Dunn 70,759 Sauk 45,317 Eau Claire 143,354 Sawyer 13,016 Florence 2,519 Shawano 15,311 Fond du Lac 51,582 Sheboygan 138,733 Forest 6,797 Taylor 10,979 Grant 21,163 Trempealeau 13,392 Green 25,552 Vernon 10,180 Green Lake 27,703 Vilas 7,659 Iowa 8,434 Walworth 61,379 Iron 6,606 Washburn 8,901 Jackson 10,674 Washington 50,922 Jefferson 40,547 Waukesha 193,562 Juneau 13,679 Waupaca 27,127 Kenosha 1,057,148 Waushara 16,006 Kewaunee 9,199 Winnebago 197,184 La Crosse 170,773 Wood 1,416,565 Lafayette	Dodge	44,908	Rock	117,787
Dunn 70,759 Sauk 45,317 Eau Claire 143,354 Sawyer 13,016 Florence 2,519 Shawano 15,311 Fond du Lac 51,582 Sheboygan 138,733 Forest 6,797 Taylor 10,979 Grant 21,163 Trempealeau 13,392 Green 25,552 Vernon 10,180 Green Lake 27,703 Vilas 7,659 Iowa 8,434 Walworth 61,379 Iron 6,606 Washburn 8,901 Jackson 10,674 Washington 50,922 Jefferson 40,547 Waukesha 193,562 Juneau 13,679 Waupaca 27,127 Kenosha 1,057,148 Waushara 16,006 Kewaunee 9,199 Winnebago 197,184 La Crosse 170,773 Wood 1,416,565 Lafayette 5,085 1 Langlade 17,498 Bad	Door	56,796	Rusk	17,502
Dunn 70,759 Sauk 45,317 Eau Claire 143,354 Sawyer 13,016 Florence 2,519 Shawano 15,311 Fond du Lac 51,582 Sheboygan 138,733 Forest 6,797 Taylor 10,979 Grant 21,163 Trempealeau 13,392 Green 25,552 Vernon 10,180 Green Lake 27,703 Vilas 7,659 Iowa 8,434 Walworth 61,379 Iron 6,606 Washburn 8,901 Jackson 10,674 Washington 50,922 Jefferson 40,547 Waukesha 193,562 Juneau 13,679 Waupaca 27,127 Kenosha 1,057,148 Waushara 16,006 Kewaunee 9,199 Winnebago 197,184 La Crosse 170,773 Wood 1,416,565 Lafayette 5,085 1 Langlade 17,498 Bad	Douglas	22 201	St. Chair	22 122
Eau Claire 143,354 Sawyer 13,016 Florence 2,519 Shawano 15,311 Fond du Lac 51,582 Sheboygan 138,733 Forest 6,797 Taylor 10,979 Grant 21,163 Trempealeau 13,392 Green 25,552 Vernon 10,180 Green Lake 27,703 Vilas 7,659 Iowa 8,434 Walworth 61,379 Iron 6,606 Washburn 8,901 Jackson 10,674 Washington 50,922 Jefferson 40,547 Waukesha 193,562 Juneau 13,679 Waupaca 27,127 Kenosha 1,057,148 Waushara 16,006 Kewaunee 9,199 Winnebago 197,184 La Crosse 170,773 Wood 1,416,565 Lafayette 5,085 Incoln 17,430 Lac du Flambeau 24,675 Oneida Nation 7,282 Oneida Nation	_			
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Iowa 8,434 Walworth 61,379 Iron 6,606 Washburn 8,901 Jackson 10,674 Washington 50,922 Jefferson 40,547 Waukesha 193,562 Juneau 13,679 Waupaca 27,127 Kenosha 1,057,148 Waushara 16,006 Kewaunee 9,199 Winnebago 197,184 La Crosse 170,773 Wood 1,416,565 Lafayette 5,085 Incoln 17,498 Bad River 15,098 Lincoln 17,430 Lac du Flambeau 24,675 Oneida Nation 7,282 Manitowoc 49,976 Potawatomi 5,074 Marathon 190,455 Red Cliff 11,990 Marinette 46,034 Sokaogon 15,533 Marquette 5,299	Green	25,552	Vernon	10,180
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Jackson 10,674 Washington 50,922 Jefferson 40,547 Waukesha 193,562 Juneau 13,679 Waupaca 27,127 Kenosha 1,057,148 Waushara 16,006 Kewaunee 9,199 Winnebago 197,184 La Crosse 170,773 Wood 1,416,565 Lafayette 5,085 15,098 Langlade 17,498 Bad River 15,098 Lincoln 17,430 Lac du Flambeau 24,675 Oneida Nation 7,282 Manitowoc 49,976 Potawatomi 5,074 Marathon 190,455 Red Cliff 11,990 Marinette 46,034 Sokaogon 15,533 Marquette 14,401 Stockbridge-Munsee 5,299	Iowa	8,434	Walworth	61,379
Jackson 10,674 Washington 50,922 Jefferson 40,547 Waukesha 193,562 Juneau 13,679 Waupaca 27,127 Kenosha 1,057,148 Waushara 16,006 Kewaunee 9,199 Winnebago 197,184 La Crosse 170,773 Wood 1,416,565 Lafayette 5,085 15,098 Langlade 17,498 Bad River 15,098 Lincoln 17,430 Lac du Flambeau 24,675 Oneida Nation 7,282 Manitowoc 49,976 Potawatomi 5,074 Marathon 190,455 Red Cliff 11,990 Marinette 46,034 Sokaogon 15,533 Marquette 14,401 Stockbridge-Munsee 5,299	Iron	6 606	Washburn	8 901
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Lincoln 17,430 Lac du Flambeau 24,675 Oneida Nation 7,282 Manitowoc 49,976 Potawatomi 5,074 Marathon 190,455 Red Cliff 11,990 Marinette 46,034 Sokaogon 15,533 Marquette 14,401 Stockbridge-Munsee 5,299	Lafayette	5,085		
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