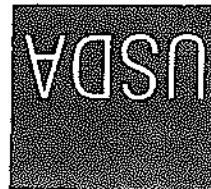


MD DEC 4 10 76 7 2250



JAN 21 2000

Date: _____

Reply to Attention of: _____

Subject: _____

To: _____

Maryland Waiver Request - Section 824 of PRWORA

Arthur T. Foley

Director

Program Development Division

Attached is a request from Maryland to extend Waivers 980052 and 970073 which exempt certain counties from the work requirements for able-bodied adults without dependents. The State agency is also requesting waivers for additional counties.

The current waivers expire on February 29, 2000.

Please do not hesitate to contact this office if you have any questions.

Joseph Weingart
JOSEPH WEINGART

Regional Director

Food Stamp Program

Attachments



United States
Department of
Agriculture
Food and Consumer
Service
Mid-Atlantic Region
Mercer Corporate Park
300 Corporate Boulevard
Robbinsville, N.J. 08691-1598



The same calculation was performed using 1996:Q3 total non-agricultural data for each county to arrive at the 1996 employment-to-population ratio for 1996. This result was compared to the 1997 employment-to-population ratio to demonstrate a trend in the decline of the employment-to-population ratio in these counties. The findings support Maryland's exemption request under Section 824 for Allegany, Anne Arundel, Calvert, Caroline, Carroll, Cecil, Charles, Dorchester, Frederick, Garrett, Harford, Howard, Kent, Prince George's, Queen Anne's, St. Mary's, and Somerset Counties.

Table III: Employment-to-Population Ratio, Absolute Change 1996-1998, Selected Counties

Jurisdiction	1996 Employment -to- Population Ratio	1997 Employment -to- Population Ratio	1998 Employment -to- Population Ratio	Change in Ratio 1996-1997	Change in Ratio 1997-1998
Allegany County	63.9%	65.2%	65.8%	1.4%	0.6%
Anne Arundel County	52.0%	52.9%	53.6%	0.9%	0.8%
Calvert County	32.8%	32.4%	32.7%	-0.4%	0.3%
Caroline County	42.3%	43.6%	45.5%	1.4%	1.9%
Carroll County	42.2%	42.2%	43.2%	0.0%	1.0%
Cecil County	36.8%	37.5%	38.3%	0.7%	0.8%
Charles County	42.1%	42.6%	42.7%	0.5%	0.1%
Dorchester County	59.1%	59.4%	58.7%	0.3%	-0.7%
Frederick County	52.5%	53.0%	54.2%	0.5%	1.2%
Garrett County	52.8%	52.0%	52.4%	-0.8%	0.5%
Harford County	39.4%	42.2%	43.2%	2.8%	1.0%
Howard County	63.7%	65.8%	67.6%	2.1%	1.9%
Kent County	53.4%	55.2%	56.1%	1.8%	0.9%
Prince George's County	51.7%	52.5%	52.9%	0.7%	0.4%
Queen Anne's County	34.8%	35.0%	36.5%	0.2%	1.6%
St. Mary's County	47.6%	50.9%	54.5%	3.4%	3.5%
Somerset County	33.5%	34.8%	36.1%	1.3%	1.3%
National Average	68.9%	69.9%	70.8%	1.0%	0.9%

Source: Bureau of Labor Statistics and Maryland Office of Planning, U.S. Bureau of the Census.

These seventeen counties fall below the national average for the measure of employment-to-population ratio. The average employment to population ratio for these seventeen counties in 1998 is 42 % compared to the national average of 70.8%. The combined employment-to-population ratio for these seventeen counties is 51.7%.

Lagging and/or Declining Job Growth: In general, the ABAWDs who will be required to work have limited education and skill levels, which restrict their employment opportunities. In order to obtain a more accurate measure of available jobs for this group, target industries have been identified that have a preponderance of low-wage jobs (for example, restaurants and hotels) where ABAWDs may be better able to obtain employment (see *Appendix I* for a list of the target industries). According to the latest available data from the Maryland Department of Labor, Licensing and Regulation, Anne Arundel, Calvert, Caroline, Garrett, Harford, Kent, Prince George's, Washington, Wicomico, Worcester Counties, and Baltimore City are experiencing declining employment in these target industries (see Table IV below).³ Therefore, the State is seeking an exemption under Section 824 for these jurisdictions.

**Table IV: Employment Decline in Target Industries
Selected Maryland Counties, 4th Quarters 1997 and 1998**

Jurisdiction	Employment in Target Industries 1997:Q4	Employment in Target Industries 1998:Q4	# of New Jobs in Target Industries (Loss)
Anne Arundel County	29,188	28,701	-487
Calvert County	2,856	2,763	-93
Caroline County	575	550	-25
Garrett County	1,186	1,172	-14
Harford County	9,463	9,297	-166
Kent County	1,144	1,101	-43
Prince George's County	39,343	39,036	-307
Washington County	7,121	6,863	-258
Wicomico County	5,992	5,981	-11
Worcester County	6,171	6,044	-127
Baltimore City	32,170	31,700	-470

Source: Maryland Department of Human Resources, Maryland Department of Labor, Licensing and Regulation.

Thirteen jurisdictions exhibit job deficits when the employment opportunities are compared to numbers of ABAWDs between the ages of 18 and 50 (see Table V below). Although the job deficit for Allegany County is only one job, according to the U.S. Bureau of Labor Statistics, the unemployment rate for this county was 8.8% in 1998, as compared to the national average of 4.5% for the same year. Based on these job deficits in target industries, the State is seeking an exemption under Section 824 for Allegany, Anne Arundel, Calvert, Caroline, Garrett, Harford, Kent, Prince George's, Somerset, Washington, Wicomico, and Worcester Counties, and Baltimore City.

**Table V: Employment Growth in Target Industries vs. # of ABAWDs
Selected Maryland Counties, 4th Quarter 1998**

Jurisdiction	Employment in Target Industries 1997:Q4	Employment in Target Industries 1998:Q4	# of New Jobs in Target Industries	# ABAWDs (November 1999)	Job Deficit (November 1999)
USA	4,893	5,094	201	202	-1
Allegany County	29,188	28,701	-487	140	-627
Anne Arundel County	2,856	2,763	-93	22	-115
Calvert County	575	550	-25	12	-37
Caroline County	1,186	1,172	-14	75	-89
Garrett County	9,463	9,297	-166	52	-218
Harford County	1,144	1,101	-43	11	-54
Kent County	39,343	39,036	-307	204	-511
Prince George's County	495	535	40	67	-27
Somerset County	7,121	6,863	-258	79	-337
Washington County	5,992	5,981	-11	82	-93
Wicomico County	6,171	6,044	-127	45	-172
Worcester County	32,170	31,700	-470	3,311	-3,781
Baltimore City					

Source: Maryland Department of Human Resources, Maryland Department of Labor, Licensing and Regulation.

If the number of TCA recipients who will be required to find work under PRWORA is taken into consideration, job deficits occur in several jurisdictions that show a net increase when only considering the ABAWDs. These jurisdictions are Baltimore, Charles, Dorchester, Frederick, Queen Anne's, and Saint Mary's counties, (see Table VI). Furthermore, Allegany, Anne Arundel, Calvert, Caroline, Garrett, Harford, Kent, Prince George's, Somerset, Washington, Wicomico, and Worcester counties, and Baltimore City will experience even greater deficits in job opportunities when TCA recipients subject to work requirements are taken into account. Therefore, the State is requesting an exemption under Section 824 for Allegany, Anne Arundel, Baltimore, Calvert, Caroline, Charles, Dorchester, Frederick, Garrett, Harford, Kent, Prince George's, Queen Anne's, St. Mary's, Somerset, Washington, Wicomico, and Worcester counties, and Baltimore City. In addition, many of these jurisdictions experienced an unemployment rate in calendar year 1998 and the first seven months of 1999 that was higher than the national unemployment rates of 4.5% for calendar year 1998, (see Table VII on page 8).

**Table VI: Employment Growth in Target Industries Versus # of ABAWDs & TCA Recipients Subject to Work Requirement
Selected Maryland Counties**

Jurisdiction	# of New Jobs in Target Industries 1998:Q4 versus 1997:Q4	# ABAWDs (November 1999)	Jobs Available (November 1999)	# of TCA Recipients subject to Work Requirement (November 1999)	Job Deficit with TCA work Requirement (November 1999)
Allegany County	201	202	-1	195	-196
Anne Arundel County	-487	140	-627	973	-1,600
Baltimore County	921	217	704	3,010	-2,306
Calvert County	-93	22	-115	192	-307
Caroline County	-25	12	-37	96	-133
Charles County	254	33	221	340	-119
Dorchester County	101	85	16	333	-317
Frederick County	79	74	5	284	-279
Garrett County	-14	75	-89	129	-218
Harford County	-166	52	-218	432	-650
Kent County	-43	11	-54	12	-66
Prince George's County	-307	204	-511	3,528	-4,039
Queen Anne's County	59	13	46	55	-9
St. Mary's County	40	26	14	252	-238
Somerset County	-110	67	-177	90	-267
Washington County	-258	79	-337	248	-585
Wicomico County	-11	82	-93	483	-576
Worcester County	-127	45	-172	123	-304
Baltimore City	-470	3,311	-3,781	23,923	-27,704

Source: Maryland Department of Human Resources and Maryland Department of Labor, Licensing and Regulation.

Table VII: Average Unemployment Rates, 1998 and January-July 1999,
Selected Maryland Counties

Average Unemployment Rate Jan. 99-July 99	Average Unemployment Rate 1998	Jurisdiction
7.5%	8.8%	Allegany County
3.9%	4.7%	Baltimore County
4.8%	6.7%	Cecil County
7.5%	9.9%	Dorchester County
8.8%	11.0%	Garrett County
3.5%	4.6%	Harford County
4.0%	6.2%	Kent County
7.8%	9.5%	Somerset County
5.0%	5.6%	Wicomico County
9.9%	11.0%	Worcester County
7.4%	9.0%	Baltimore City
	4.5%	U.S. National Average

Source: U.S. Department of Labor, Bureau of Labor Statistics.

12.

Summary of Request for Exemption under Section 824: Table VIII lists the counties the State of Maryland is seeking to exempt under Section 824 of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996 (P.L. 104-193) and the reason(s) for the requested exemption. The State is seeking an exemption for Garrett and Worcester counties because of unemployment rates in excess of 10% in calendar year 1998. The State further seeks an exemption under Section 824 for Allegany, Cecil, Wicomico, and Worcester Counties, and Baltimore City because their designation by the U.S. Department of Labor as Labor Surplus Areas. The State is also seeking an exemption under Section 824 for Allegany, Anne Arundel, Calvert, Caroline, Carroll, Cecil, Charles, Dorchester, Frederick, Garrett, Harford, Howard, Kent, Prince George's, Queen Anne's, St. Mary's, and Somerset counties because of low and/or declining employment to population ratios. The State of Maryland is also seeking an exemption under Section 824 for Anne Arundel, Calvert, Caroline, Garrett, Harford, Kent, Prince George's, Washington, Wicomico, and Worcester counties, and Baltimore City, because of lagging and/or declining job growth in target industries. Finally, the State of Maryland is seeking an exemption under Section 824 for Allegany, Anne Arundel, Baltimore, Calvert, Caroline, Charles, Dorchester, Frederick, Garrett, Harford, Kent, Prince George's, Queen Anne's, St. Mary's, Somerset, Washington, Wicomico, and Worcester counties, and Baltimore City, because of job deficits in target industries when considering the number of Temporary Cash Assistance recipients with whom the ABAWDs must compete.

Table VIII: Summary Table of Request for Exemption from Section 824

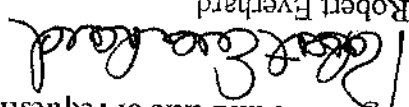
Jurisdiction	Avg. Unemp. Rate Greater than 10%	Labor Surplus Area Designation	Low and/or Declining Employment -10- Population Ratio	Lagging and/or Declining Job Growth	Job Deficit (Target Ind. Emp) with ABAWD Work Req.	Job Deficit (Target Ind. Emp.) with ABAWD/TCA Work Req.
USA Allegany Co. ✓		X	X		X	X
USA Anne Arundel Co. ✓			X	X	X	X
USA Baltimore Co. ✓						
USA Baltimore City ✓		X		X	X	X
USA Calvert Co. ✓			X	X	X	X
USA Caroline Co. ✓			X	X	X	X
USA Carroll Co. ✓			X			
USA Cecil Co. ✓		X	X			
USA Charles Co. ✓			X			X
USA Dorchester Co. ✓			X			X
USA Frederick Co. ✓			X			X
USA Garrett Co. ✓	X		X	X	X	X
USA Harford Co. ✓			X	X	X	X
USA Howard Co. ✓			X			
USA Kent Co. ✓			X	X	X	X
USA Prince George's Co. ✓			X	X	X	X
USA Queen Anne's Co. ✓			X			X
USA St. Mary's Co. ✓			X			X
USA Somerset Co. ✓			X		X	X
USA Washington ✓				X	X	X
USA Wicomico ✓		X		X	X	X
USA Worcester ✓	X	X		X	X	X

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13. **Anticipated impact on households and State agency operations:** Approval of this waiver would mitigate the adverse effects experienced by low-income households in areas with slow job growth by allowing them to continue receiving basic nutritional sustenance through the Food Stamp program. As demonstrated above, many of these households would otherwise face the loss of such basic support because of circumstances beyond their control. Complying with the work requirement of Section 6(o) as amended by Section 824 in an economic environment of slow job growth such as exists in the State of Maryland is not a reasonable expectation.

14. **Anticipated implementation date and time period for which waiver is needed:** Implementation is needed by January 31, 2000 to prevent current Food Stamp recipients from losing access to the program. The waiver is requested for one year, at which time employment and placement data will be reevaluated.

15. **Signature and title of requesting official:** 
Robert Everhard
Maryland Department of Human Resources
311 W. Saratoga Street
Baltimore, Maryland 21201
(410) 767-7338

16. **Date of Request:** January 7, 2000