



STATE OF WASHINGTON
DEPARTMENT OF SOCIAL AND HEALTH SERVICES

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February 8, 2000

Dennis Stewart, Program Director
Food Stamp Program
Western Region, Food and Nutrition Service
United States Department of Agriculture
550 Kearny Street, Room 400
San Francisco, California 94108-2518

Dear Mr. Stewart:

The state of Washington is submitting its requests for the waivers to the Food Stamp Act, Section 6(0). Our prior waivers (#970032, 980063, and 970164) are set to expire on March 31, 2000, and we are submitting new data to support the continuation of these waivers.

7!
(980063
is PA)

Section 6 (0)(4) permits waivers for areas with (1) an unemployment rate of more than 10 percent; or (2) insufficient jobs to provide employment. Administrative Notice 97 - 27 allowed self-certification for areas of the state where the unemployment rate is more than ten percent and the data is supported by the Bureau of Labor Statistics.

This waiver request includes:

- Areas that we can self-certify. This would extend the waiver until March 31, 2001.
- Areas that have insufficient jobs as evidenced by their listing as Federal Labor Surplus areas or as supported by other employment data.

We will be submitting a separate waiver request (waiver #970153) for American Indian Reservations based on employment-to-population ratios below the state average.

We will not be submitting a waiver request for San Juan County or Everett City in Snohomish County previously covered under waiver #980063. They are no longer Labor Surplus Areas.



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We request that all Food Stamp Employment and Training waivers expire on September 30, 2001. A waiver period consistent with the Federal Fiscal Year would allow the greatest control of fiscal resources. The present waiver timeline means that resource allocation is completed prior to, and always lags behind changes in the Federal Labor Surplus Areas, resulting in uneven service delivery when areas change from exempt to non-exempt, with no additional service monies available.

Thank you for your consideration of these waivers. If you have any questions, please call Cindy Mund, Administrator, Program Operations at (360) 413-3206.

Sincerely,



MICHAEL W. MASTEN, Director
WorkFirst Division

Enclosures

cc: Liz Begert Dunbar
Tom Hilyard
James C. Wilson
Jim Shober
Roxanne Lowe
Cindy Mund
Mary Monahan
Diane DeVore

problem is — don't have data past 9/30/00 (FFY 2000).
WA SA is asking for 18 month waiver based on data
for next 6 mos. Could reapply in October 2000 to get
on cycle.

**Waiver Request, Washington Counties and Areas
with High Unemployment , or Insufficient Jobs**

1. **Waiver serial number:** 970032, 970063, and 970164
2. **Type of request:** Waive the work requirement for those Able-Bodied Adults with No Dependents (ABAWDs) where unemployment rates are above 10 percent, or where there are insufficient jobs.
3. **Primary regulation citation:** Food Stamp Act of 1977 Work Requirements Section 6 (o) (2) as amended through Public Law 104-193.
4. **Secondary regulation citation:** Food Stamp Act of 1977 Work Requirements Section 6 (o) (4) as amended through Public Law 104-193.
5. **State:** Washington
6. **Region:** Western
7. **Regulatory requirements:** No individual (between 18 and 50) will be eligible to participate in the Food Stamp Program as a member of any household if the individual received Food Stamp benefits for three full months unless the individual works 20 hours a week, participates in a work program for 20 hours or more a week, participates in a workfare program each month, or is exempt.
8. **Description of proposed alternate procedures:** Exempt all ABAWD Food Stamp recipients in areas of the state with unemployment over 10 percent, or where there are insufficient jobs.
9. **Rationale for Request:** Request a waiver from Food Stamp work requirements for areas with high unemployment or insufficient jobs. In these areas many individuals receiving Food Stamps will be unable to find employment despite significant effort. The supply of employment will be particularly short in these areas for individuals with little training or education, as is the case for most ABAWDs receiving Food Stamps. The following areas qualify either on the basis of high unemployment, or on the basis of insufficient jobs as evidenced by their listing on federal Labor Surplus areas list, their low employment-to-population ratios, or because a declining job base indicates significant economic dislocation.

A. Counties with Unemployment over 10 Percent:

Request a waiver for the following counties on the basis of unemployment rates exceeding 10 percent. The data submitted is the average for the 12 months of calendar year 1999. This data is provided by the Washington State Employment Security Department, a BLS-cooperating agency, and conform to BLS methodologies for

calculating rates. (See Appendix A, for the unemployment data, for the following counties):

Columbia
Ferry
Pend Oreille

B. Counties and Cities Listed on the Federal Labor Surplus Areas list, October 1999:

We request a waiver for the following counties and cities on the basis of insufficient jobs, as evidenced by their listing as Federal Labor Surplus areas. Federal Labor Surplus areas are defined as areas where unemployment exceeds the national unemployment rate by 20 percent or more over the previous two calendar years. (See Appendix B.)

- ✓ Adams County
- ✓ Benton County [Less Kennewick City, Richland City]
- ✓ Chelan County
- ✓ Clallam County
- ✓ Columbia County (qualifies as 10%)
- ✓ Cowlitz County [Less Longview City]
- ✓ Douglas County
- ✓ Ferry County (qualifies as 10%)
- ✓ Franklin County
- ✓ Grant County
- ✓ Grays Harbor County
- ✓ Jefferson County
- ✓ Kittitas County
- ✓ Klickitat County
- ✓ Lewis County
- ✓ Mason County
- ✓ Okanogan County
- ✓ Pacific County
- ✓ Pend Oreille County
- ✓ Skagit County
- ✓ Skamania County
- ✓ Stevens County
- ✓ Wahkiakum County
- ✓ Yakima County [Less Yakima City]

Cities Listed on the Federal Labor Surplus Areas list, October, 1999

- ✓ Bremerton City [in Kitsap County]
- ✓ Kennewick City [in Benton County]
- ✓ Lakewood City [in Pierce County]
- ✓ Longview City [in Cowlitz County]
- ✓ Walla Walla City [in Walla Walla County]
- ✓ Yakima City [in Yakima County]

C. Benton , Walla Walla and Whatcom Counties on the Basis of Insufficient Jobs:

We request that the balance of able-bodied adults without dependents be exempt from Food Stamp work requirements in Benton, Walla Walla, and Whatcom Counties on the basis of insufficient jobs. Portions of Benton and Walla Walla counties are listed on the Labor Surplus Areas list, but we believe that available data indicate that the entire county should be exempt.

Benton, Walla Walla and Whatcom Counties are over the threshold established to qualify for Federal Labor Surplus status. According to statistics available from the Washington state Department of Employment Security, and the U.S. Bureau of Labor Statistics, unemployment rates in these counties have averaged more than 20 percent over the national unemployment rate for the last two calendar years. In Walla Walla County, unemployment during the same period was 6.7 percent, or 52.27 percent over the national rate of 4.4 percent for the previous two years. In Benton County, the unemployment rate was 6.1 percent or 38.64 percent over the national rate for the previous two years. In Whatcom County, the unemployment rate was 5.5 percent or 25.00 percent over the national rate for the previous two years. These Counties have not shared in the decrease in the unemployment rate shared at the state or national level.

Benton , Walla Walla, and Whatcom Counties

Benton, Walla Walla and Whatcom Counties should be made exempt since the latest unemployment data available to the state (annual averages for 1998 and 1999) indicate that unemployment significantly exceeds the 20 percent criterion for listing as labor surplus areas. The following table summarizes data for the US and the two counties for the years 1998 and 1999.

<i>1998-99 Annual Averages</i>	US	Benton	Walla Walla	Whatcom
Labor Force	138,517,000	71,050	26,410	79,750
Employment	127,202,000	66,700	24,630	73,350
Unemployment	6,039,000	4,350	1,780	4,400
Unemployment Rate	4.4%	6.1%	6.7%	5.5%
<i>Percentage Over US Rate</i>	<i>5.28</i>	38.64%	52.27%	25.00%

US data is from the Bureau of Labor Statistics. Washington State data is from the Washington State Employment Security Department.

10. Anticipated impact on households and state agency operations:

Households: Exempting clients from work requirements in areas of high unemployment or insufficient jobs will reduce the likelihood of clients being cut from assistance without an ability to support themselves. Focusing our Food Stamp Employment and Training activities on areas of the state where there is a robust economy will allow the state to devote sufficient resources to ensure that the training and job search activities required lead to desired outcomes of client self-sufficiency.

State Agency: Exemption will allow the Department of Social and Health Services to spend its staff and monetary resources in the most efficient manner. The Department's commitment to meeting the needs of recipients may require expensive and ineffective investments in workfare slots in areas with insufficient jobs, absent waivers for these areas.

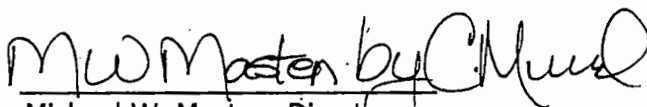
11. Caseload information, including percent, characteristics, and quality control error rate for affected population:

For caseload and quality control information, see attachments. The data is for federal fiscal year 1999.

12. Anticipated implementation date and time for which waiver is needed: April 1, 2000 through March 31, 2001.

13. Proposed quality control review procedures: No anticipated change in the quality control review procedure.

14. Signature and title of requesting official



Michael W. Masten, Director
WorkFirst Division, Director

2-8-2000

Date