



STATE OF WASHINGTON
DEPARTMENT OF SOCIAL AND HEALTH SERVICES
Olympia WA 98504-5000

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April 10, 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, CA 94108-2518

Dear Mr. Stewart:

Washington State is submitting its requests for the Tribal Reservation waivers to the Food Stamp Act, Section 6(0). Our prior waiver (#970153) expires on April 30, 2000. At this time, we are submitting last year's data to support the continuation of this waiver until April 30, 2001.

We used the data provided by the Bureau of Indian Affairs Report on Indian Service Populations and Labor Force Status, which was provided to us for all tribes in our state.

Section 6 (0)(4) of the Food Stamp Act permits waivers for areas with: (1) an unemployment rate of more than 10 percent; or (2) insufficient jobs to provide employment.

We request that the exemption for the Muckleshoot Reservation be continued based on insufficient jobs as indicated by the average unemployment rate greater than 20 percent above the national average for calendar years 1997 and 1998.

Administrative Notice 97-46 specifically states that studies have indicated that the employment-to-population ratio for most Indian reservations is much lower than the nation as a whole, and, based on the low ratios, most reservations would qualify for waivers. In addition, the majority of the tribal reservations in Washington State are located in one or more counties that meet either the unemployment rates or the Labor Surplus Area criteria for a waiver.

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

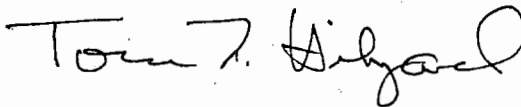


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resource allocation is completed prior to, and always lags behind, changes in the Federal Labor Surplus Areas, resulting in uneven service delivery when areas change from exempt to non-exempt, with no additional service monies available.

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,

A handwritten signature in black ink, appearing to read "Tom L. Hilyard". The signature is fluid and cursive, with the first name "Tom" being more prominent.

Tom L. Hilyard, Acting Director
WorkFirst Division

Enclosures

cc: Liz Begert Dunbar
Gwen Gua
Sarah Colleen Sotomish
Mike Masten
Cindy Mund
Tara Blair
Mary Monahan
Diane DeVore

**Waiver Request, for American Indian Reservations
with High Unemployment or Insufficient Jobs**

1. **Waiver serial number:** 970153
2. **Type of request:** Waive the work requirement for those Able-Bodied Adults Without Dependents (ABAWDs) on American Indian Reservations 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 workfare each month, or is exempt.
8. **Description of proposed alternate procedures:** Exempt all ABAWD Food Stamp recipients in tribal reservation area 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 who are 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. American Indian Reservations With Insufficient Jobs:

We request a waiver from the Food Stamp work requirements for able bodied adults without dependents for the following tribes on the basis of insufficient jobs. Data from the Bureau of Indian Affairs Indian Service Population and Labor Force report for 1998 (see Appendix C) show that these tribal areas are substantially below the state level for unemployment, the employment-to-population ratio for the total population, and the employment-to-population ratio for the population 16 and up.

Employment-to-population ratios are a small fraction of state rates, indicating very slack local labor markets and substantial proportions of discouraged workers. Employment-to-population ratios for the total population range from 10.8 percent below to 82.5 percent below state rates. Employment-to-population ratios for the population 16 and over are also much lower than state rates. Second, the data show that unemployment rates (defined as the percent of the population 16 years and up seeking work, but unable to find employment) is significantly higher than the state average rate of 4.6 for 1998, ranging from 18.4 to 82.6 percent.

Please see Appendix C for labor force and employment data for these reservations. In addition, the majority of reservations are located within counties that are exempt based on:

1. Unemployment rates exceeding 10% (Appendix A);
2. Insufficient jobs based on inclusion in the Labor Surplus Areas list (Appendix B); or
3. The unemployment rate in the county for the 24 month period 1998-1999 exceeded the national unemployment rate by at least one-fifth. (Appendix C).

A table showing the reservation and corresponding county exemption status is also included in Appendix C for your convenience.

Waivers are requested for the following Tribal Reservations in Washington State:

- ✓ Chehalis - 20% ~ Thurston
- ✓ Colville - LSA ~ Ferry
- ✓ Hoh - LSA ~ Jefferson
- ✓ Jamestown S'Klallam - LSA ~ Clallam
- ✓ Kalispel + 10%
- ✓ Lower Elwha - LSA ~ Clallam
- ✓ Lummi whatcom ~ 20%

- ✓ Makah LSA - Clallam
- ✓ Muckleshoot + 20%
- ✓ Nisqually
- ✓ Nooksack
- ✓ Port Gamble S'Klallam
- ✓ Puyallup
- ✓ Quileute
- ✓ Quinault
- ✓ Sauk-Suiattle - 20% above national average whatcom
- ✓ Shoalwater Bay
- ✓ Skokomish
- ✓ Spokane
- ✓ Squaxin Island
- ✓ Stillaguamish
- ✓ Suquamish
- ✓ Swinomish
- ✓ Upper Skagit
- ✓ Yakama

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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.

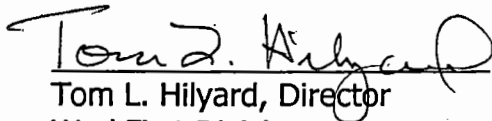
11. Caseload information, including percent, characteristics, and quality control error rate for affected population:

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:
May 1, 2000 through April 30, 2001.

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

14. Signature and title of requesting official


Tom L. Hilyard, Director
WorkFirst Division

4-11-00
Date